UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7
25 FUNSTON ROAD
KANSAS CITY, KANSAS 66115

51

MAY 15 1990

RECEIVED
MAY 18 1990
USEPA, RCRA Branch

MEMORANDUM

SUBJECT: Transmittal of Inspection Report - RCRA

FROM: John W. Bosky
Chief, RCRA Monitoring Section, EMCM/ENSV

TO: Michael Sanderson
Chief, RCRA/WSTM

This memorandum transmits the following compliance monitoring inspection report performed by the RCRA Monitoring Section, Environmental Monitoring and Compliance Branch, Environmental Services Division.

Facility	EPA ID Number	Activity No.	Potential Areas of Non-Compliance
Pries Enterprises Independence, IA	IAD981716806	ANF17	- Hazardous Waste Determination - Land Restriction Notices - Storage of Waste Without a Permit - Used Oil Marketer - Training, Inspections, Contingency Plan, Waste Analysis Plan, Biennial Report, Closure Plan, Financial and Liability

Attachments

RECEIVED
MAY 21 1990
IOWA SECTION

RCRA INSPECTION REPORT RECEIPT AND FOLLOW-UP REQUEST

Facility Name: Pries Enterprises

Facility Location: Independence

EPA ID Number: IAD981716806

Date of Inspection: 5 / 1 / 90

Inspector: Dedriel Newsome

Activity Number: ANF 17 Inspection Type: CEI

Date Report Transmitted: / /

*Date Report Received: / /

*Additional Information Requested/Needed Not Included In Report:

#Photographs Taken: 7 #Photographs in Report: 7

*Additional Copies Needed (Specify Which)

*Additional Information Needed By: / /

Field Notes Taped [Yes/(No)]

*Disposition: Retain, Discard, Transcribe.

#Samples Taken: Ø #Samples Analyzed: Ø

*Disposition: Retain, Discard, Analyze more (specify which)

*Report Reviewed By:

*Date Review Completed: / /

*Items to be completed by RCRA Branch, WSTM and returned to Chief, Field Investigations Section, EMCM/ENSV

REPORT OF RCRA COMPLIANCE INSPECTION

AT

PRIES ENTERPRISES, INC.
701 17th Street S.E.
Independence, Iowa 50644

EPA ID Number: IAD981716806

BY

U.S. ENVIRONMENTAL PROTECTION AGENCY
Region VII
Environmental Services Division

INTRODUCTION

At the request of the Waste Management Division (WSTM), a RCRA compliance evaluation inspection was performed at Pries Enterprises located in Independence, IA on May 1,1990. The inspection was conducted under the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended. This report and attachments present the results of the inspection.

PARTICIPANTS

Pries Enterprises, Inc. (Pries):
Merle McMahon, President
Tom Kurimski, Plant Manager
Richard Hazel, Comptroller
John Holmes, Hired Attorney (by phone only)

U.S. Environmental Protection Agency (EPA):
Dedriel L. Newsome, Environmental Engineer (report author)
Lynn Slugantz, Environmental Engineer

INSPECTION PROCEDURES

Upon arrival at the facility, I met Mr. McMahon. I presented him with my EPA credentials and explained the purpose and procedures of the inspection. Mr. McMahon was provided with the Confidentiality Notice which he signed as acknowledgment of receipt (attachment 1). During the inspection, Mr. McMahon acted as the facility representative. Discussions consisted of facility operations, wastes generated and waste management practices. I conducted a visual inspection of the facility and was accompanied by Mr. McMahon. At the conclusion of the inspection, the findings and recommendations were summarized with

the facility representative. The Request For Confidential Treatment form, a Document of Receipt and a Notice of Violation (NOV) were signed by Mr. McMahon as acknowledgement of receipt, see attachments 2 through 4.

FACILITY DESCRIPTION

Pries manufactures extruded aluminum products. They are produced by heating seven inch aluminum billets to 900°F and then pressing them through dies using hydraulic actuated force. The extruded parts are fabricated (trimmed and cut to the proper length) and assembled for off-site shipment. Currently there are 30 employees that operate 80 hours a week as a second shift was added. The plant area is 55,000 square feet, see attachment 5 for the facility layout.

As discussed in the previous RCRA inspection report conducted on 2/11/88, Pries had in the past incorporated painting of the products. The painting process consisted of parts cleaning, painting in two dry booths and drying in an oven. The parts cleaner system consisted of a caustic (NaOH) and soap cleaner tank, two clear water rinse tanks, an electroless chrome deposition tank (chromating with chromic acid) and two clear final water rinse tanks. The wastewater generated from this parts cleaner system was treated in an on-site pretreatment unit. The wastewater pretreatment unit included an equalization tank, treatment tanks for chrome reduction, solids sedimentation and a plate and frame filter press for sludge dewatering.

This painting process was tried and determined inadequate due to design problems. Therefore, the painting operations ceased on 12/22/87. Currently, the painting process and the wastewater pretreatment equipment is empty and is for sale. The remaining wastewater pretreatment equipment is shown in photos 1 and 2. The area where the caustic storage tank was located when the painting operations were first incorporated is shown in photo 3. The other wastewater pretreatment equipment was located in the area shown in photo 4 and attachment 5. The facility representatives were not sure what the dark liquid was shown in the photo. Mr. McMahon stuck his fingers in it and it was not oily. There was no visible surface drains leading to this area.

Mr. McMahon stated that they no longer accept any empty drums from other manufacturers for storage purposes since the methyl parathion incident. The incident involved a couple of drums labeled methyl parathion noted during the previous inspection. It was later determined that these drums were tripled rinse by the agricultural company that supplied them before they were used by Pries for storage.

FINDINGS AND OBSERVATIONS

1. RCRA Status

Pries submitted a Notification of Hazardous Waste Activity form on 8/14/87 as a generator. A Consent Agreement/Consent Order (CA/CO) was issued on 9/30/88 in regard to the storage of the F019 waste over 90 days. Pries has denied most of the counts in the CA/CO. They feel that they are not a storage facility that should be subject to all of the requirements in the order. EPA is currently waiting to hear from the judge on a Motion For Specific Statement concerning their witnesses' testimonies. As requested by Lynn Slugantz, Pries was treated as a container storage facility during this inspection even though Pries denies it. Pries is currently operating as a conditionally exempt small quantity generator (CESQG) based on the generation rate of the parts washer spent solvent discussed below.

2. The wastes generated by Pries is as follows:

a. Painting Process Wastes

(i). F019 Sludge

There was a F019 waste generated from the wastewater pretreatment process when it was being incorporated and it was stored over 90 days. This F019 waste would not be accepted by the disposal company as the pH was too high. The waste (40 drums) was reprocessed and manifested off-site on 6/17/88 to Chemical Waste Management (CWM), CID Landfill, Calumet City, IL. The area where the drums of F019 waste was stored is shown in photo 5.

After the painting operations ceased, the remaining wastewater in the parts cleaner system was processed. The additional F019 waste (43 drums) was manifested to CWM, CID Landfill, on 11/4/88 for disposal. When this waste was manifested off-site, F019 was a soft hammer waste. A demonstration was submitted to EPA and was accepted. The waste was manifested with a certification and a notification, see attachment 6. However, the state manifest document number was used on the notice instead of the 5-digit manifest document number as required. A NOV was issued for the failure to comply with 40 CFR 268.7.

(ii). Lab Chemicals

Lab chemicals, such as buffer solutions, were used to determine the pH of the parts cleaner system tank solutions. Mr. McMahon stated that these remaining lab chemicals are currently used in the pH determination of the die caustic cleaner tank.

(iii). Paint Scrapes and Paint Filters

Mr. McMahon stated that paint was peeled from the dry paint booths to clean them. Mr. Kurimski stated that about one-half of a 55-gallon drum was collected. He stated that it and the paint filters that were removed were sent to CWM, CID Landfill, with the F019 waste. Several of the paints used contained lead chromate, see attachment 7. It appears that a hazardous waste determination in regard to EP toxicity should have been made on this paint waste. Mr. Kurimski stated that the filters were removed just this once after the operation ceased.

(iv). Spent Solvent

The thinner, xylene, was used to clean the painting equipment. The spent thinner was collected in a 55-gallon drum. It was manifested off-site on 8/25/88 to Hydrite Chemical Co., Waterloo, IA. The spent solvent was manifested as a D001 hazardous waste instead of a F003 waste as the waste analysis shows, see attachment 8. A NOV was issued for the failure to comply with 40 CFR 262.11 as an incorrect determination was made on the waste. Also, no land disposal restriction notice was included with the F-listed waste. A NOV was issued for the failure to comply with 40 CFR 268.7.

(v). Remaining Materials

During the visual inspection of the old paint room, there were three drums of material that had been used in the painting process. The first was lube oil that was used to oil the overhead automatic line, the second appeared to be spent thinner, and the third was Parco Cleaner 334 that the supplier would not accept as it was opened, see photo 6. The second drum had an open bunghole and was about one-third full. The odor from this drum was of paint and thinner. Mr. Kurimski inserted a rubber tube into the drum and it showed about 14 inches of a clear liquid as a top layer and about four inches of what appeared to be white paint as a bottom layer. The facility representatives were not sure if it was spent thinner as it was to all have been manifested off-site. A NOV was issued for the failure to comply with 40 CFR 262.11. A Material Safety Data Sheet (MSDS) was provided for the Parco Cleaner 334, see attachment 9. It appears that this material is not a RCRA hazardous waste based on the MSDS.

b. Spent Caustic

Caustic (NaOH) is used to clean the dies. The dies are dipped into a heated 300-gallon tank of the caustic solution. Once the caustic becomes spent, it is pumped directly into a treatment

tank, see photo 7. There it is neutralized with sulfuric acid to a pH of 6 to 8 before being discharged into the sanitary sewer. Mr. McMahon stated that the city wastewater treatment facility is notified of the waste before it is discharged. The caustic solution becomes spent about once every three to four weeks. This is an increase since the previous inspection due to the addition of a second shift. The generation rate of this spent caustic is not included in Pries total quantity determination as it is treated in a closed loop neutralization process that discharges to the city sanitary sewer.

Mr. McMahon also stated that they receive spent caustic generated in the same manner from their Pries Enterprises facility located at 3136 Wagner Road in Waterloo, IA. He stated that they receive about two 30 to 35-gallon drums every six weeks. He also stated that it is stored in the old paint room near the caustic treatment tank until the on-site caustic solution becomes spent. Based on this, it appears that the longest the waste would remain on-site before it is treated would be three to four weeks. Mr. McMahon was told to stopped receiving this waste from the Waterloo facility as they were not permitted to do so. A NOV was issued for the failure to comply with 3005 RCRA. At the time of this inspection, there were no drums from the Waterloo facility on-site.

c. Maintenance Shop Wastes

(i). Spent Mineral Spirits

There is a 30-gallon parts washer in the maintenance shop for equipment maintenance. This washer contains mineral spirits and is serviced by Northland Oil Products (Northland), see attachment 10. When Northland changes the spent solvent (D001) in the washer once every two months they manifest it off-site. However, the manifests are incomplete as they do not contain a generator EPA ID number and some are not dated by the generator, see attachment 11. A NOV was issued for the failure to comply with 40 CFR 262.20(a). However, after further review, it appears that this citation would not apply as this is a CESQG waste. The maximum amount manifested off-site in one month was 19 gallons (124 pounds based on the density obtained from the solvent's MSDS).

(ii). Waste Oil

Waste oil is generated from process equipment and company trucks. It is collected in 55-gallon drums and the hydraulic oil from the press may also be collected in a sump near the press. Mr. Kurimski stated that when there is a large amount of waste oil generated it is collected by Eagle Oil Service, Cedar Falls, IA.

He stated that when there is a small amount it is given to Hand Implement, Independence, IA to burn for heating purposes. Mr. Kurimski stated that the last amount given to Hand Implement was two to three drums in December 1989. Pries has not notified EPA that they are a marketer of waste oil nor do they follow the other documentation requirements for marketers listed in 266.43. A NOV was issued for the failure to comply with 40 CFR 266.43.

d. Aluminum Scrap

The aluminum scrap is generated throughout the process and from a dust collector on the trimming operations. This scrap is sent to Wells Aluminum, Monnet, MO, where it is remelted into billets and returned to Pries.

e. General Trash

The general trash consists of paper, cardboard, wood, sweeping compound and a small amount of refuse. It is collected in a drums and hauled to the Buchanan County Sanitary Landfill three times a week.

3. Container Storage Required Records

As a container storage facility, Pries is subject to applicable sections of Part 265. However, these items are not being maintained, see attachment 12 for checklists. Mr. John Holmes, Pries attorney, was contacted during the inspection to discuss the status of the closure plan. He stated that there has been no estimate from any company concerning the closure activities required. He stated that the requirements are too expensive and are unnecessary. Therefore, nothing has been done since the end of last year when an attempt to settle the storage issue with EPA took place. Mr. Holmes stated that the same reasons can apply to the financial assurance and liability requirements. A NOV was issued for the failure to comply with 40 CFR 265 applicable to a waste analysis plan (265.13), inspections (265.15), training (265.16), contingency plan (265.51), Biennial Report (265.75), closure plan (265.112), financial assurance and liability (Subpart H).

Dedriel Newsome

Dedriel L. Newsome
Environmental Engineer
Date: 5/11/90
Activity No: ANF17

John W. Bosky
Chief, RCRA Monitoring Section
Date: 5/14/90

Attachments

1. Confidentiality Notice (2 pages)
2. Request For Confidential Treatment
3. Document of Receipt
4. NOV
5. Facility Layout
6. F019 Soft Hammer Documents (5 pages)
7. Paint MSDS (6 pages)
8. Spent Paint Solvent Manifest Documents (5 pages)
9. Parco Cleaner 334 MSDS (2 pages)
10. Northland Service Agreement and Solvent MSDS (3 pages)
11. Parts Washer Solvent Manifests (7 pages)
12. Checklists (16 pages)

Photographs (3 page/7 photos)

S. ENVIRONMENTAL PROTECTION AG Y
RCRA INSPECTION
CONFIDENTIALITY NOTICE

<table>
<tr><td rowspan="4">Name and Address of Inspector(s)

Deodriel Newsome
U.S. EPA, Region VII
ENSV Division
~~25 Funston Road~~ 210 Walnut St #167
~~Kansas City, Kansas 66115~~
Des Moines, IA 50307</td><td colspan="2">Name and Address of Facility
Pries Enterprises, Inc
17th 701 17th St. S.E
Independence, IA</td></tr>
<tr><td colspan="2">Owner, Operator, or Agent in Charge
Merle McMahon</td></tr>
<tr><td colspan="2">Title
Pres</td></tr>
<tr><td colspan="2">Address
Independence, IA</td></tr>
<tr><td>Name of Individual to Whom Notice Given
Merle McMahon</td><td>Title
Pres</td><td>Date
5/1/92</td></tr>
</table>

It is possible that EPA will receive public requests for release of the information obtained during inspection of the facility above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FDIA), 5 U.S.C. 552; EPA regulations issued thereunder, 40 CFR Part 2; and the Resource Conservation and Recovery Act, Section 3007, as amended. EPA is required to make inspection data available in response to FOIA requests, unless the Administrator of the Agency determines that the data contains information entitled to confidential treatment.

Any or all of the information collected by EPA during the inspection may be claimed confidential, if it relates to trade secrets or commercial of financial matters that you consider to be confidential. If you make claims of confidentiality, EPA will disclose the information only to the extent, and by the means of the procedures set forth in the regulations (cited above) governing EPA's treatment of confidential information. Among other things, the regulations require that the EPA notify you in advance of publicly disclosing any information you have claimed and certified confidential.

To claim information confidential, you must certify that each claimed item meets all of the following criteria:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.

2. The information is not, and has not been, reasonably obtainable without your company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on a showing of special need in a judicial or quasi-judicial proceeding).

3. The information is not publicly available elsewhere.

4. Disclosure of the information would cause substantial harm to your company's competitive position.

At the completion of the inspection, you will be given a receipt for all documents, samples, and other materials collected. At that time you may make claims that some or all of the information is confidential and meets the four criteria listed above.

RCRA INSPECTION CONFIDENTIALITY NOTICE	Facility Pries. Ent.

If you are not authorized by your company to make confidentiality claims, this notice will be sent by certified mail, along with the receipt for documents, samples, and other materials, to the Owner, Operator, or Agent in Charge of your firm, within two days of this date. That person must return a statement, specifying any information which should receive confidential treatment.

This statement from the Owner, Operator, or Agent in Charge should be addressed to:

Mr. David A. Wagoner
Director, Waste Management Division
United States Environmental Protection Agency
726 Minnesota Avenue
Kansas City, Kansas 66101

and mailed by registered, return-receipt requested mail with in seven (7) calendar days of receipt of this Notice.

Failure by your firm to submit a written request that information be treated as confidential, either at the completion of the inspection or by the Owner, Operator, or Agent in charge, within the seven-day period, will be treated by the EPA as a waiver by your company of any claims for confidentiality regarding the inspection data.

To be completed by the facility official receiving this Notice:

I have received and read this Notice.

Name MERLE J. McMAHON

Title PRES.

Signature Merle J. McMahon

Date 5/1/90

If there is no one on the premises of the facility who is authorized to make business confidentiality claims for the firm, a copy of this Notice and other inspection materials will be sent to the Owner, Operator, or Agent in charge of the company. If there is another company official who should also receive this information, please designate below:

Name _____

Title _____

Address _____

_____

U.S. ENVIRONMENTAL PROTECTION AGENCY
726 MINNESOTA AVENUE
KANSAS CITY, KANSAS 66101

REQUEST FOR CONFIDENTIAL TREATMENT

Name of Individual	Title	Date
Merle McMahon	Pres	5/1/91
Firm Name	**Firm Address**	
Price Enterprises	Independence, IA	

Information for which Confidential Treatment is requested:

None

Acknowledgement of Claimant

The undersigned requests that confidential treatment of the information described be provided in accordance with provisions of the Freedom of Information Act (FOIA), 5 U.S.C. 552; EPA regulations issued thereunder, 40 CFR Part 2; and the Resource Conservation and Recovery Act (RCRA), Section 3007, as amended. The undersigned further acknowledges that he/she is authorized to make such claims for his/her firm.

The undersigned also certifies that each item described above meets all of the following criteria: (1) The company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures; (2) The information is not, and has not been, reasonably attainable without the company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on a showing of special need in a judicial of quasi-judicial proceeding; (3) The information is not publicly available elsewhere; and (4) Disclosure of the information would cause substantial harm to the company's competitive position.

Signature *(Owner, Operator, or Agent)*	Title
Merle McMahon	Pres.
Name of Inspector **Title**	**Inspector's Signature**
Dedriel Newsome Env. Engineer	Dedriel Newsome

U.S. ENVIRONMENTAL PROTECTION AGENCY

RECEIPT FOR SAMPLES AND DOCUMENTS

Inspector(s) Name and Address:	Firm Name and Address
Dedriel Newsome U.S. EPA, Region VII ENSV Division ~~25 Funston Road~~ 210 Walnut St. #167 ~~Kansas City, Kansas 66115~~ Des Moines, IA 50309	Pries & Enterprise 701 17th St. Independence, IA
	Name of Individual Merle Mc Mahon
	Title President
Date Collected 5/1/90	Samples were: ☐ PURCHASED ☐ ~~RECEIVED NO CHARGE~~ ☐ BORROWED
Sample Numbers	~~Amount~~ Paid for Samples
Duplicate Samples Requested ☐ YES ☐ ~~NO~~	Method of Payment ☐ CASH ☐ ~~VOUCHER~~ ☐ TO BE BILLED

The documents and samples of chemical substances and/or mixtures described below were collected in connection with the administration and enforcement of the Resource Conservation and Recovery Act.

Receipt for the document(s) and/or sample(s) described below is hereby acknowledged:

MSDS (10 pgs)
Land Restriction Notices (5 pgs)
Manifests (8 pgs)
Waste Analysis (4 pgs)
Northland Invoice

Signature *(Owner, Operator, or Agent)*	Title
Merle Mc Mahon	Pres.
Name of Inspector / **Title**	**Inspector's Signature**
Dedriel Newsome / Env. Engineer	Dedriel Newsome

Notice of Violation Pursuant to Requirements of the Resource Conservation and Recovery Act (RCRA)

TO: Facility Name: Pries Enterprises, Inc
Address: 701 17th St S.E.
Independence IA 50644
EPA ID Number: IAD981716406 Date: 5/1/90

During an inspection just completed to determine compliance with the requirements of Subtitle C of RCRA and regulations promulgated pursuant thereto, the following violations were identified:

Citation	Description of Violation
*40 CFR 262.20	Complete manifest according Part 262 Appendix A
40 CFR 262.11	Make a hazardous waste determination on the paint waste in old paint room; Incorrect determination on FC03 waste manifests off-site.
40 CFR 268.7	No land disposal notice included with the manifest shipment of FC03 waste; Include proper manifest document number
3005 RCRA	Storage at Pries Waterloo Plant caustic waste without a permit
40 CFR Part 265	Training documents, Contingency Plan, Waste analysis Plan, Inspection Log, Biennial Rpt, Closure Plan, Financial assurance, liability
40 CFR 266.43	Subject to the requirements of a used oil marketer

This notice is provided to call your attention to those areas of noncompliance at the earliest possible time. This notice does not constitute a compliance order (Administrative Civil Complaint) issued pursuant to Section 3008 of RCRA and may not be a complete listing of all violations which may be identified as a result of this inspection.

The Pries Enterprises is hereby requested to submit in writing within 10 days of receipt of this notice a description of all corrective actions taken and/or a schedule for completion of necessary correction actions to be taken to: Michael Sanderson, Chief, RCRA Branch, U. S. Environmental Protection Agency, Region VII, 726 Minnesota Ave., Kansas City, Kansas, 66101. The corrective actions taken by Pries Enterprises will be considered in subsequent enforcement follow-up. Should civil penalties be assessed, corrective action(s) will be considered in assessing the penalty amount.

If you have any questions on this Notice or wish to discuss your response, you may call Lynn Slugantz (U. S. EPA) at (913) 551-7385, or Jim Caller, (IDS EPA), at (913) 551-7146.

This Notice prepared by Dedriel Newsome Date: 5/1/90

The undersigned person hereby acknowledges that he/she has received a copy of this Notice and has read same.

*After the CEI, determined this citation does not apply as it is a CESQG waste

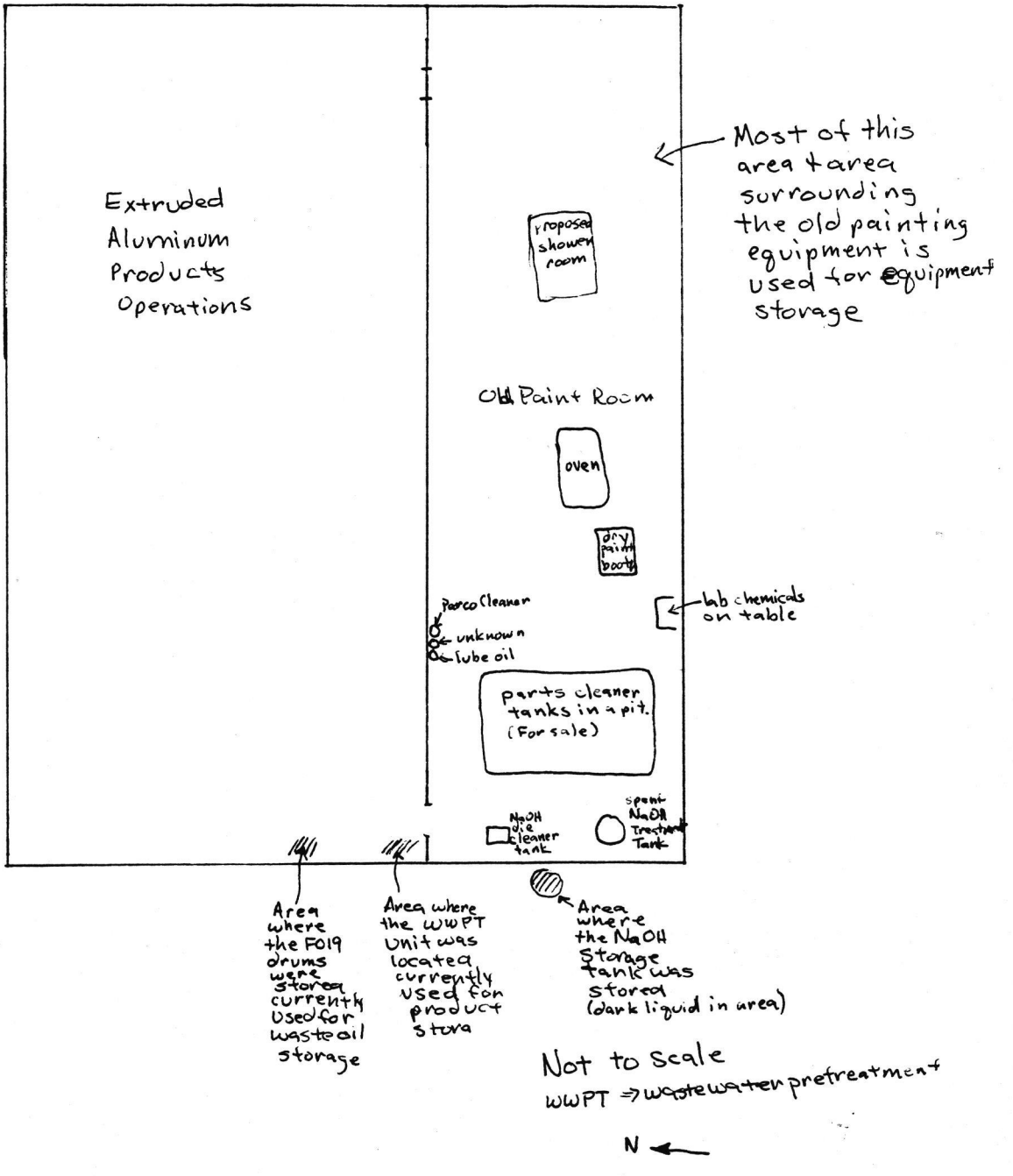
Printed Name: MERLE J. MCMAHON Date: 5/1/90

Signature: Merle J. McMahon

Title: Mgr.

7-EPA-3500.7 (Rev. 5/85)

Pries Facility Layout



Chemical Waste Management, Inc.
3003 Butterfield Road
Oak Brook, Illinois 605[illegible]
312 218-1500

Attachment I

August 19, 1988

TO: Regional Administrator

Address U. S. ENVIRONMENTAL PROTECTION AGENCY
REGION V11, 726 Minnesota Ave., Kansas City, KS 66101

RE: Soft Hammer Demonstration/Certification

In accordance with the Environmental Protection Agency's land disposal restrictions governing the first third scheduled wastes, PRIES (insert generator name) has enclosed a soft hammer demonstration and certification as per 40 CFR 268.8(a)(2) for EPA waste code(s) F019.

ENTERPRISES, INC.

The demonstration reflects our efforts to locate practically available treatment that affords the greatest environmental benefit. Based on our search for such treatment we have determined that:

X 1.) No practically available treatment exists. See attached demonstration for further details.

____ 2.) (insert treatment(s)) is the best practically available treatment (see attached demonstration for further details).

The review of practically available treatment technologies included a consideration of 1) past treatment practices, 2) a cost ratio that compared the cost of treatment, shipment and disposed versus the cost of shipment and disposal, and finally 3) a treatment hierarchy that included recycling/ recovery, destruction (incinerator) and immobilization (stabilization).

If any further information is required, please contact me at (insert phone number). 319 334-7068

Mark J. McMahon
Signature

ATTACHMENT 3

FIRST THIRD "SOFT-HAMMER" DEMONSTRATION
No Available Practical Alternative to Land Disposal

Explanation Of Why No Treatment Is Practically Available

I have not been able to locate a practical available treatment or recovery for the waste described in the cover letter because, (refer to checked items, and any additional comments):

(1) ✓ No recovery facilities have been located which will be able to recover the hazardous constituents of this waste.

(2) _____ There is no safe and legal treatment or recovery operation which I can perform practically at my site that will appreciably reduce the toxicity or mobility of the hazardous constituents of the waste.

(3) _____ I have not been treating this waste at my site in the past, using a treatment technology which has been found to appreciably reduce the toxicity or mobility or mobility of the hazardous constituents of the waste.

(4) _____ Stabilization treatment will not appreciably reduce the toxicity or mobility of the hazardous constituents of this waste.

(5) _____ This waste is a waste which incineration, thermal oxidation or other destruction technologies will not appreciably reduce the toxicity or mobility of the hazardous constituents of the waste.

(6) _____ I have examined the possibilities of recovery/recycling, incineration, other destruction technologies, and stabilization, in that order or preference, I have not been able to locate any such treatment facilities that will accept this waste.

(7) _____ The cost of treatment, shipment and disposal at the treatment/recovery facilities that have been located is greater than or equal to twice the cost of shipment and disposal at the RCRA landfill.

Additional Comments:

ATTACHMENT 4
FIRST THIRD "SOFT-HAMMER DEMONSTRATION
Soft-Hammer Waste For Which Alternative Treatment or Recovery Has Been Located

A — Rotary Kiln Incineration is a practically available technology that yields the greatest environmental benefit. This waste is principally organic residues which are best destroyed by incineration.

B — Liquid Injection Incineration is a practically available technology that yields the greatest environmental benefit. This waste is principally pumpable organic residues which are best destroyed by incineration.

C — Fuels Blending is a practically available technology that yields the greatest environmental benefit. This waste has a heating value greater than or equal to 5,000 BTU per pound and can be best reused as a hazardous waste fuel.

D — A combination of Fuels Blending, and/or Rotary Kiln or Liquid Injection is a practically available technology that yields the greatest environmental benefit. This is due to the properties of my waste which may vary slightly, from one load to the next. Solid nondispersible residues will need to be incinerated; but the pumpable or dispersible portions may be blended for hazardous waste fuels usage (when the BTU's, chlorine, ash, etc. are within the required ranges); or else incinerated.

E — Chemical Precipitation (with filtration or decanting) is a practically available technology that yields the greatest environmental benefit. This should reduce the toxicity/mobility of the hazardous constituents by reducing the toxic volume of the waste.

F — Filtration is a practically available technology that yields the greatest environmental benefit. This should reduce the toxicity/mobility of the hazardous constituents by reducing the toxic volumes of the waste.

G — Stabilization is a practically available technology that yields the greatest environmental benefit. Stabilization will reduce the mobility of the hazardous constituents of the waste. I have examined recovery and destruction technologies and found that they were not practically available for the following reason(s):

H — Chemical oxidation is a practically available technology that yields the greatest environmental benefit. Chemical oxidation will reduce the toxicity of hazardous constituents in the waste.

This waste is not suitable for incineration or fuels due to:

I — the low percentage of hazardous organic constitutents presents,
J — the low heating value of the waste,
K — the high percentage of inorganic constituents present,
L — the lack of located available capacity of incineration or fuels blending facilities.

This waste is not suitable for recovery due to:

M — The hazardous constituents are present in concentations that make recovery technologically impossible.
N — The hazardous constituents are present in concentrations that make recovery economically infeasible.
O — No recovery facilities were located that could treat this type of waste.
P — No recovery facilities were located that had capacity to treat this type of waste.

Q — The treatment technology identified above is a past practice that has been demonstrated to meaningfully reduce the toxicity and/or mobility of the waste.

Additional Comments:

6-3

"SOFT-HAMMER" WASTES

LAND DISPOSAL RESTRICTION NOTIFICATION AND CERTIFICATION FORM

Generator Name: PRIES ENTERPRISES, INC. Manifest Number: IL2002553

EPA ID Number: IAD981716806 CWM Profile Number: G27940

This form is submitted to: CID in accordance with 40 CFR Part 268, which restricts the land disposal of certain hazardous wastes. I have marked the appropriate box below to indicate whether alternative treatment has been found for my waste. (See reverse side for the list of "soft-hammer" wastes and instructions on using this form.)

☐ **I. SOFT-HAMMER WASTE FOR WHICH ALTERNATIVE TREATMENT OR RECOVERY HAS BEEN LOCATED**

The soft-hammer waste I generate is(are) _____.

I have identified a practically available treatment technology that yields the greatest environmental benefit. Together with the initial shipment of waste represented by this form, I submitted a demonstration in accordance with 40 CFR 268.8(a)(1), including a list of facilities and facility officials contacted, complete with addresses, telephone numbers, and contact dates, and a justification that I have chosen the best treatment that is practically available.

I certify under penalty of law that the requirements of 40 CFR 268.8(a)(1) have been met and that I have contracted to treat my waste (or will otherwise provide treatment) by the practically available technology which yields the greatest environmental benefit, as indicated in my demonstration. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

☒ **II. SOFT-HAMMER WASTE FOR WHICH DISPOSAL IN LANDFILL OR SURFACE IMPOUNDMENT IS THE ONLY PRACTICAL ALTERNATIVE TO TREATMENT CURRENTLY AVAILABLE**

The soft-hammer waste(s) I generate or have treated is(are) R Q HAZARDOUS WASTE SOLIDS NOS: ORM-E NA9189 (F019)

I have made a good-faith effort to locate and contract with treatment and recovery facilities practically available which can meaningfully reduce the toxicity or mobility of hazardous constituents in the waste, as an alternative to land disposal. I have found no such alternative facility. Together with the initial shipment of waste represented by this form, I submitted a demonstration in accordance with 40 CFR 268.8(a)(2), including a list of facilities and facility officials contacted, addresses, telephone numbers, contact dates, and an explanation of why no treatment is practically available. This soft-hammer waste must be disposed of in a landfill or surface impoundment meeting the minimum technological standards until treatment standards are set for the waste or May 8, 1990, whichever occurs first.

"I certify under penalty of law that the requirements of 40 CFR 268.8(a)(1) have been met and that disposal in a landfill or surface impoundment is the only practical alternative to treatment currently available. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false informations, including the possibility of fine and imprisonment."

☐ **III. TREATMENT OR RECOVERY FACILITY HAS TREATED THE WASTE**

The following soft-hammer waste(s) was treated in accordance with the generator's demonstration: _____.

I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with treatment as specified in the generator's demonstration. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

☐ **IV. SOFT-HAMMER WASTE DESTINED FOR LAND DISPOSAL OTHER THAN IN LANDFILL OR SURFACE IMPOUNDMENT (e.g. DEEP INJECTION WELL)**

The soft-hammer waste(s) I generate is(are) _____. This waste is being disposed of in a land disposal unit other than a landfill or surface impoundment and therefore is not subject to the certification and demonstration requirements of Section II.

Signature Merle J. McMahon Title President Date 11/4/88

What is a "Soft-Hammer" Waste?

"Soft-Hammer" wastes are those listed hazardous wastes in the First- and Second-Third of the Scheduled Wastes for which EPA has not set treatment standards. See section 3004(g) of the Resource, Conservation, and Recovery Act (RCRA).

List of "Soft-Hammer Wastes Under First-Third (8/8/88)

F006 - (Wastewater)
F007
F008
F009
F019

K004 - (Wastewater)
K008 - (Wastewater)
K011
K013
K014
K017
K021 - (Wastewater)
K022 - (Wastewater)
K031
K035
K036 - (Wastewater)
K046 - (Explosive non-wastewaters)
K060 - (Wastewater)
K061 - (Wastewater)
K069 - (Calcium sulfate sub-category)
K069 - (Wastewater)
K073
K083 - (Except no ash sub-category)
K084
K085
K086 - (Solvent sludge, caustic water wash and sludge subcategory)
K101 - (High arsenic subcategory greater than 1%)
K102 - (High arsenic subcategory greater than 1%)
K106

P001
P004
P005
P010
P011
P012
P015
P016
P018
P020
P030
P036
P037
P039
P041
P048
P050
P058
P059
P063
P068
P069
P070
P071
P081
P082
P084
P087
P089
P092
P094
P097
P102
P105
P108
P110
P115
P120
P122 - when present at concentrations greater than 10%
P123

U007
U009
U010
U012
U016
U018
U019
U022
U029
U031
U036
U037
U041
U043
U044
U046
U050
U051
U053
U061
U063
U064
U066
U067
U074
U077
U078
U086
U089
U103
U105
U108
U115
U122
U124
U129
U130
U133
U134
U137
U151
U154
U155
U157
U158
U159
U171
U177
U180
U185
U188
U192
U200
U209
U210
U211
U219
U220
U221
U223
U226
U227
U228
U237
U238
U248 - when present at concentrations 0.3% or less
U249 - when present at concentrations 10% or less

How Must "Soft-Hammer" Wastes Be Managed?

Until May 8, 1990 these wastes may be disposed in a landfill or surface impoundment only if prior to such disposal, the generator has made a good-faith effort to locate and contract with treatment and recovery facilities practically available which provide the greatest environmental benefit.

What is "Practical Treatment?"

First, if a generator's "soft-hammer" wastes were treated in the past, EPA says it would consider at least this type of treatment to be "practical" for that generator. Second, EPA presents a cost ratio that measures the cost of treatment relative to the baseline cost of shipment and disposal in a minimum technological landfill or surface impoundment. If treating the waste costs at least twice as much as not treating the waste, EPA would ordinarily consider that form of treatment to be impractical. Third, EPA has provided in the rule's preamble a generic hierachy of preferred treatment methods for certain First-Third wastes. Last, in general, the Agency says it favors recovery/recycling facilities as the best method, followed by destruction technologies such as incineration (especially for inorganics), and then stabilization where recycling or destruction is unavailable or inappropriate (especially for inorganics).

Which Box Should I Mark?

Mark Box I on the front of this form if you generate (or have treated) one of the hazardous wastes listed above, and you have located a treatment or recovery process which yields the greatest environmental benefit.

Mark Box II if you generate one of the hazardous wastes listed above but have been unable to locate an alternative treatment. Note that if this waste is disposed in a landfill or surface impoundment, the waste must comply with the minimum technological requirements.

Mark Box III if you have treated soft-hammer waste in accordance with the generator's demonstration.

Mark Box IV if your soft-hammer waste is being land disposed in a unit other than a landfill or surface impoundment. The certification and demonstration requirements of Box I, II, and III do not apply. Please note that all first-third wastes (except K049, K050, K051, K052, K062, K071, and K104 which are subject to a two year variance) destined for deep well injection are subject to soft-hammer provisions until treatment standards are established for deep injection wells or until 5/8/90, whichever comes sooner.

Where Should The Forms Be Sent?

The generator must forward a certification and demonstration (demonstration with the initial shipment only) to the treatment/disposal facility and to the Regional Administrator. The treatment facility must forward a copy of the generator's certification and demonstration (demonstration with the initial shipment only) plus the treatment facility certification to the disposal facility. The disposal facility must place this information in the operating record.

№ 86048

CHEMICAL WASTE MANAGEMENT, INC.

4300 W. 123rd Street
Alsip, Illinois 60658
Phone: (312) 396-1060

FED. I.D. No. ILD000806604
I.L.S.W.H. No. 0075

MO	DAY	YR
11	4	88

P. O. No. _____

SHIPPER (from) Price Enterprises PHONE: (319) 334 7068 CONTACT: Merle McMahon

IL. GEN. CODE No.: _____ U.S. EPA I.D. No. _____

ADDRESS 701 17th St S.E. Independence STATE IA COUNTY _____

DESTINATION (to) CID SITE _____

IL. SITE CODE No.: _____ U.S. EPA No. _____

ADDRESS _____ STATE _____ COUNTY _____

No. of Units	Description and Classification	Total Weight	Auth. No.	Exp. Date	Profile	Manifest
	RQ HAZ WAS SOL NOS (FOA)		880069	11/8/88	6 27940	2002553
	ORM-E NA9189					

CHEMTREC (800) 424-9300

This is to certify that the above named are properly classified, described, packaged, marked, and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation, and the Environmental Protection Agency.

Start Load 7:00 A.M. End Load 7:45 A.M. Total Time 45 Min.

Customer Signature Merle J. McMahon

Driver Instructions _____

Left Site		Comments	Start Mileage	5986
Start Load	7:00 A.M.		Finish Mileage	
End Unloading			Total Return Mileage	
Total Time				

Tractor No. 22172 Trailer No. 4093

Copies to: Gold-Shipper/Pink-Disposal Site/Canary-Hauler/White-Hauler

6-5

MATERIAL SAFETY DATA SHEET
FOR COATINGS, RESINS, AND RELATED MATERIALS

"ESSENTIALLY SIMILAR" TO FORM OSHA-20

DATE OF PREP
10/15/87

* SECTION I *

MANUFACTURER'S NAME: BATAVIA COATINGS DIVISION
WHITTAKER CORPORATION
1500 LATHEM STREET
BATAVIA, IL 60510

H.M.I.S. RATING

HEALTH	1
FLAMMABILITY	3
REACTIVITY	1
PERSONAL PROTECTION	H

EMERGENCY TELEPHONE NUMBER: (312) 879-6800
INFORMATION TELEPHONE NUMBER: (312) 879-6800

MANUFACTURERS CODE IDENTIFICATION: 200K6 10/14/87 1
PRODUCT FAMILY: POLYESTER ENAMEL
TRADE NAME: PC1400 D&H BLACK

* SECTION II - HAZARDOUS INGREDIENTS *

INGREDIENT	CAS NUMBER	PERCENT BY WT.	TLV	PEL	VAPR PRESS MM HG@ 20C
XYLENE	1330-20-7	4.94	100	100	5.10
DI ISOBUTYL KETONE	108-83-8	.01	50	50	1.70
AROMATIC HYDROCARBON	64742-95-6	18.58	100	100	1.97
TITANIUM DIOXIDE	13463-67-7	1.08	15.00	15,000	N/A
LEAD CHROMATE	1344-37-2	1.57	.20	.20MG	N/A
AROMATIC HYDROCARBON	64742-94-5	4.89	100	100	.60
ISOBUTYL ALCOHOL	78-83-1	.67	100	100	8.80
NORMAL BUTYL ALCOHOL	71-36-3	2.27	100	100	4.40
TOLUENE	108-88-3	.25	200	200	38.00
ISOPROPYL ALCOHOL	67-63-0	.96	400	400	33.00
DEGMBE ACETATE	124-17-4	1.82	N/E	N/E	.04

* SECTION III - PHYSICAL DATA *

BOILING RANGE: 179 TO 482 DEG. F
EVAPORATION RATE: SLOWER THAN ETHER

VAPOR DENSITY: HEAVIER THAN AIR
% VOLATILE BY VOLUME: 43.13%
WEIGHT PER GALLON: 9.07

* SECTION IV - FIRE AND EXPLOSION HAZARD DATA *

FLAMMABILITY CLASSIFICATION: FLAMMABLE LIQUID - CLASS IC LEL: 2.0
FLASHPOINT: 81 F

EXTINGUISHING MEDIA:
CARBON DIOXIDE, FOAM, DRY CHEMICAL

UNUSUAL FIRE AND EXPLOSION HAZARDS:
STORE BELOW 120 DEGREES FAHRENHEIT.

SPECIAL FIRE FIGHTING PROCEDURES:
WEAR SELF-CONTAINED BREATHING APPARATUS.

* SECTION IX - SPECIAL PRECAUTIONS *

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORAGE:
STORE BELOW 120 DEGREES FAHRENHEIT.

DOL STORAGE CATEGORY: OSHA CLASSIFICATION 29 CFR 1910.106(A) PARTS 18-19. REFER TO SECTION IV.

OTHER PRECAUTIONS:
AVOID EXPOSURE TO VAPORS. GROUND CONTAINER WHILE POURING. MINIMIZE DISTANCE OF FREE FALL TO AVOID STATIC ELECTRICITY GENERATION.

NOTE: PERCENTAGES SHOWN IN SECTION II AS .00% MAY OR MAY NOT BE PRESENT IN TRACE AMOUNTS DUE TO NORMAL VARIATION IN RAW MATERIALS OR MANUFACTURING PROCESS.

* SECTION X - SPECIAL WARNINGS *

REPEAT EXPOSURE MAY RESULT IN DAMAGE TO OR ABNORMALITIES OF THE LIVER.

REPEAT EXPOSURE MAY RESULT IN DAMAGE TO OR ABNORMALITIES OF THE KIDNEYS.

REPEAT EXPOSURE MAY RESULT IN DAMAGE TO OR ABNORMALITIES OF THE BLOOD.

REPEAT EXPOSURE MAY RESULT IN DAMAGE TO OR ABNORMALITIES OF THE EYES.

REPEAT EXPOSURE MAY RESULT IN DAMAGE TO OR ABNORMALITIES OF THE LUNGS.

SKIN - ABSORPTION THROUGH SKIN WILL CONTRIBUTE SIGNIFICANTLY TO TOTAL DOSE FROM ALL ROUTES.

REPEAT EXPOSURE MAY RESULT IN DAMAGE TO OR ABNORMALITIES OF THE BRAIN OR NERVOUS SYSTEM.

MATERIAL SAFETY DATA SHEET
FOR COATINGS, RESINS, AND RELATED MATERIALS

"ESSENTIALLY SIMILAR" TO FORM OSHA-20

DATE OF PREP 10/15/87

* SECTION I *

MANUFACTURER'S NAME: BATAVIA COATINGS DIVISION
WHITTAKER CORPORATION
1500 LATHEM STREET
BATAVIA, IL 60510

H.M.I.S. RATING
HEALTH 1
FLAMMABILITY 3
REACTIVITY 1
PERSONAL PROTECTION H

EMERGENCY TELEPHONE NUMBER: (312) 879-6800
INFORMATION TELEPHONE NUMBER: (312) 879-6800

MANUFACTURERS CODE IDENTIFICATION: 200T7 10/14/87 1
PRODUCT FAMILY: POLYESTER ENAMEL
TRADE NAME: PC1400 D&H BEIGE

* SECTION II - HAZARDOUS INGREDIENTS *

INGREDIENT	CAS NUMBER	PERCENT BY WT.	TLV	PEL	VAPR PRESS MM HG@ 20C
XYLENE	1330-20-7	3.44	100	100	5.10
DI ISOBUTYL KETONE	108-83-8	.01	50	50	1.70
AROMATIC HYDROCARBON	64742-95-6	13.21	100	100	1.97
TITANIUM DIOXIDE	13463-67-7	30.15	15.00	15,000	N/A
LEAD CHROMATE	1344-37-2	1.60	.20	.20MG	N/A
AROMATIC HYDROCARBON	64742-94-5	3.36	100	100	.60
ISOBUTYL ALCOHOL	78-83-1	.47	100	100	8.80
NORMAL BUTYL ALCOHOL	71-36-3	1.61	100	100	4.40
TOLUENE	108-88-3	.17	200	200	38.00
ISOPROPYL ALCOHOL	67-63-0	.67	400	400	33.00
DEGMBE ACETATE	124-17-4	1.28	N/E	N/E	.04

* SECTION III - PHYSICAL DATA *

BOILING RANGE: 179 TO 482 DEG. F
EVAPORATION RATE: SLOWER THAN ETHER

VAPOR DENSITY: HEAVIER THAN AIR
% VOLATILE BY VOLUME: 39.02%
WEIGHT PER GALLON: 11.72

* SECTION IV - FIRE AND EXPLOSION HAZARD DATA *

FLAMMABILITY CLASSIFICATION: FLAMMABLE LIQUID - CLASS IC LEL: 2.0
FLASHPOINT: 81 F

EXTINGUISHING MEDIA:
CARBON DIOXIDE, FOAM, DRY CHEMICAL

UNUSUAL FIRE AND EXPLOSION HAZARDS:
STORE BELOW 120 DEGREES FAHRENHEIT.

SPECIAL FIRE FIGHTING PROCEDURES:
WEAR SELF-CONTAINED BREATHING APPARATUS.

* SECTION V - HEALTH HAZARD DATA *

PRIMARY ROUTE OF ENTRY: INHALATION

EFFECTS OF OVEREXPOSURE:

ACUTE
HEADACHE, DIZZINESS, NAUSEA, AND/OR SEVERE EYE IRRITATION ON CONTACT.

CHRONIC

EMERGENCY AND FIRST AID PROCEDURES:
EYE CONTACT - FLUSH WITH WATER)
SKIN CONTACT - WASH WITH SOAPY WATER) -- OBTAIN MEDICAL ATTENTION IMMEDIATELY!
INHALATION - REMOVE TO FRESH AIR)

* SECTION VI - REACTIVITY DATA *

STABILITY: STABLE CONDITIONS TO AVOID: N/A

INCOMPATABILITY - MATERIALS TO AVOID:
UNKNOWN

HAZARDOUS DECOMPOSITION PRODUCTS:

HAZARDOUS POLYMERIZATION WILL NOT OCCUR

CONDITIONS TO AVOID:

* SECTION VII - SPILL OR LEAK PROCEDURES *

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED:
REMOVE ALL SOURCES OF IGNITION. VENTILATE AREAS. REMOVE WITH INERT, ABSORBENT, AND NON-SPARKING TOOLS.

WASTE DISPOSAL METHOD:
INCINERATE IN AN APPROVED FACILITY. DO NOT INCINERATE IN CLOSED CONTAINER.

* SECTION VIII - SPECIAL PROTECTION INFORMATION *

RESPIRATORY PROTECTION:
VENTILATE WORKING SPACES TO BELOW THRESHOLD LIMIT VALUE. IF LOCAL EXHAUST NOT AVAILABLE, USE BUREAU OF MINES APPROVED RESPIRATORY DEVICE

SEE BUREAU OF MINES I.C. 8436, SUPT. OF DOCUMENTS.

VENTILATION:
LOCAL EXHAUST TO MAINTAIN VAPOR CONCENTRATION BELOW THRESHOLD LIMIT VALUE.

PROTECTIVE GLOVES:

REQUIRED FOR REPEATED OR PROLONGED CONTACT.

EYE PROTECTION:

PROTECTIVE GOGGLES OR MASK REQUIRED TO PROTECT AGAINST SPLASH.

OTHER PROTECTIVE EQUIPMENT:

EYE BATH RECOMMENDED.

* SECTION IX - SPECIAL PRECAUTIONS *

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORAGE:
STORE BELOW 120 DEGREES FAHRENHEIT.

DOL STORAGE CATEGORY: OSHA CLASSIFICATION 29 CFR 1910.106(A) PARTS 18-19. REFER TO SECTION IV.

OTHER PRECAUTIONS:
AVOID EXPOSURE TO VAPORS. GROUND CONTAINER WHILE POURING. MINIMIZE DISTANCE OF FREE FALL TO AVOID STATIC ELECTRICITY GENERATION.

NOTE: PERCENTAGES SHOWN IN SECTION II AS .00% MAY OR MAY NOT BE PRESENT IN TRACE AMOUNTS DUE TO NORMAL VARIATION IN RAW MATERIALS OR MANUFACTURING PROCESS.

* SECTION X - SPECIAL WARNINGS *

REPEAT EXPOSURE MAY RESULT IN DAMAGE TO OR ABNORMALITIES OF THE LIVER.

REPEAT EXPOSURE MAY RESULT IN DAMAGE TO OR ABNORMALITIES OF THE KIDNEYS.

REPEAT EXPOSURE MAY RESULT IN DAMAGE TO OR ABNORMALITIES OF THE BLOOD.

REPEAT EXPOSURE MAY RESULT IN DAMAGE TO OR ABNORMALITIES OF THE EYES.

REPEAT EXPOSURE MAY RESULT IN DAMAGE TO OR ABNORMALITIES OF THE LUNGS.

SKIN - ABSORPTION THROUGH SKIN WILL CONTRIBUTE SIGNIFICANTLY TO TOTAL DOSE FROM ALL ROUTES.

REPEAT EXPOSURE MAY RESULT IN DAMAGE TO OR ABNORMALITIES OF THE BRAIN OR NERVOUS SYSTEM.

MATERIAL SAFETY DATA SHEET
FOR COATINGS, RESINS, AND RELATED MATERIALS

"ESSENTIALLY SIMILAR" TO FORM OSHA-20

DATE OF PREP
10/15/87

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* SECTION I *

MANUFACTURER'S NAME: BATAVIA COATINGS DIVISION
WHITTAKER CORPORATION
1500 LATHEM STREET
BATAVIA, IL 60510

H.M.I.S. RATING
HEALTH 1
FLAMMABILITY 3
REACTIVITY 1
PERSONAL PROTECTION H

EMERGENCY TELEPHONE NUMBER: (312) 879-6800
INFORMATION TELEPHONE NUMBER: (312) 879-6800

MANUFACTURERS CODE IDENTIFICATION: 201T129 10/14/87 1
PRODUCT FAMILY: POLYESTER ENAMEL
TRADE NAME: PC1400 DEALERS BROWN

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* SECTION II - HAZARDOUS INGREDIENTS *

INGREDIENT	CAS NUMBER	PERCENT BY WT.	TLV	PEL	VAPR PRESS MM HG@ 20C
XYLENE	1330-20-7	4.63	100	100	5.10
DI ISOBUTYL KETONE	108-83-8	.01	50	50	1.70
AROMATIC HYDROCARBON	64742-95-6	14.63	100	100	1.97
TITANIUM DIOXIDE	13463-67-7	2.52	15.00	15,000	N/A
AROMATIC HYDROCARBON	64742-94-5	4.56	100	100	.60
ISOBUTYL ALCOHOL	78-83-1	.63	100	100	8.80
NORMAL BUTYL ALCOHOL	71-36-3	1.39	100	100	4.40
TOLUENE	108-88-3	.24	200	200	38.00
ISOPROPYL ALCOHOL	67-63-0	.90	400	400	33.00
DEGMBE ACETATE	124-17-4	1.01	N/E	N/E	.04

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* SECTION III - PHYSICAL DATA *

BOILING RANGE: 179 TO 482 DEG. F
EVAPORATION RATE: SLOWER THAN ETHER

VAPOR DENSITY: HEAVIER THAN AIR
% VOLATILE BY VOLUME: 39.03%
WEIGHT PER GALLON: 10.12

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* SECTION IV - FIRE AND EXPLOSION HAZARD DATA *

FLAMMABILITY CLASSIFICATION: FLAMMABLE LIQUID - CLASS IC LEL: 2.0
FLASHPOINT: 81 F

EXTINGUISHING MEDIA:
CARBON DIOXIDE, FOAM, DRY CHEMICAL

UNUSUAL FIRE AND EXPLOSION HAZARDS:
STORE BELOW 120 DEGREES FAHRENHEIT.

SPECIAL FIRE FIGHTING PROCEDURES:
WEAR SELF-CONTAINED BREATHING APPARATUS.

MATERIAL SAFETY DATA SHEET
FOR COATINGS, RESINS, AND RELATED MATERIALS

"ESSENTIALLY SIMILAR" TO FORM OSHA-20

DATE OF PREP 10/15/87 — FOR PC1400 DEALERS BROWN —

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* SECTION V - HEALTH HAZARD DATA *

PRIMARY ROUTE OF ENTRY: INHALATION

EFFECTS OF OVEREXPOSURE:

ACUTE
HEADACHE, DIZZINESS, NAUSEA, AND/OR SEVERE EYE IRRITATION ON CONTACT.

CHRONIC

EMERGENCY AND FIRST AID PROCEDURES:
EYE CONTACT - FLUSH WITH WATER
SKIN CONTACT - WASH WITH SOAPY WATER
INHALATION - REMOVE TO FRESH AIR
} -- OBTAIN MEDICAL ATTENTION IMMEDIATELY!

---

* SECTION VI - REACTIVITY DATA *

STABILITY: STABLE — CONDITIONS TO AVOID: N/A

INCOMPATABILITY - MATERIALS TO AVOID:
UNKNOWN

HAZARDOUS DECOMPOSITION PRODUCTS:

HAZARDOUS POLYMERIZATION WILL NOT OCCUR

CONDITIONS TO AVOID:

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* SECTION VII - SPILL OR LEAK PROCEDURES *

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED:
REMOVE ALL SOURCES OF IGNITION. VENTILATE AREAS. REMOVE WITH INERT, ABSORBENT, AND NON-SPARKING TOOLS.

WASTE DISPOSAL METHOD:
INCINERATE IN AN APPROVED FACILITY. DO NOT INCINERATE IN CLOSED CONTAINER.

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* SECTION VIII - SPECIAL PROTECTION INFORMATION *

RESPIRATORY PROTECTION:
VENTILATE WORKING SPACES TO BELOW THRESHOLD LIMIT VALUE. IF LOCAL EXHAUST NOT AVAILABLE, USE BUREAU OF MINES APPROVED RESPIRATORY DEVICE

SEE BUREAU OF MINES I.C. 8436, SUPT. OF DOCUMENTS.

VENTILATION:
LOCAL EXHAUST TO MAINTAIN VAPOR CONCENTRATION BELOW THRESHOLD LIMIT VALUE.

PROTECTIVE GLOVES:

REQUIRED FOR REPEATED OR PROLONGED CONTACT.

EYE PROTECTION:

PROTECTIVE GOGGLES OR MASK REQUIRED TO PROTECT AGAINST SPLASH.

OTHER PROTECTIVE EQUIPMENT:

EYE BATH RECOMMENDED.

* SECTION IX - SPECIAL PRECAUTIONS *

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORAGE:
STORE BELOW 120 DEGREES FAHRENHEIT.

DOL STORAGE CATEGORY: OSHA CLASSIFICATION 29 CFR 1910.106(A) PARTS 18-19. REFER TO SECTION IV.

OTHER PRECAUTIONS:
AVOID EXPOSURE TO VAPORS. GROUND CONTAINER WHILE POURING. MINIMIZE DISTANCE OF FREE FALL TO AVOID STATIC ELECTRICITY GENERATION.

NOTE: PERCENTAGES SHOWN IN SECTION II AS .00% MAY OR MAY NOT BE PRESENT IN TRACE AMOUNTS DUE TO NORMAL VARIATION IN RAW MATERIALS OR MANUFACTURING PROCESS.

* SECTION X - SPECIAL WARNINGS *

REPEAT EXPOSURE MAY RESULT IN DAMAGE TO OR ABNORMALITIES OF THE LIVER.

REPEAT EXPOSURE MAY RESULT IN DAMAGE TO OR ABNORMALITIES OF THE KIDNEYS.

REPEAT EXPOSURE MAY RESULT IN DAMAGE TO OR ABNORMALITIES OF THE BLOOD.

REPEAT EXPOSURE MAY RESULT IN DAMAGE TO OR ABNORMALITIES OF THE EYES.

REPEAT EXPOSURE MAY RESULT IN DAMAGE TO OR ABNORMALITIES OF THE LUNGS.

SKIN - ABSORPTION THROUGH SKIN WILL CONTRIBUTE SIGNIFICANTLY TO TOTAL DOSE FROM ALL ROUTES.

REPEAT EXPOSURE MAY RESULT IN DAMAGE TO OR ABNORMALITIES OF THE BRAIN OR NERVOUS SYSTEM.

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: I·A·D·9·8·1·7·1·6·8·0·6
Manifest Document No.: 0·2·2·9·7
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

GENERATOR

3. Generator's Name and Mailing Address
Pries Enterprises, Inc.
701 17th Street S.E.
Independence, Iowa 50644
4. Generator's Phone (319-334-7068

A. State Manifest Document Number: 2299
B. State Generator's ID:

5. Transporter 1 Company Name: Hydrite Chemical Co., Milwaukee
6. US EPA ID Number: W·I·D·0·0·6·4·3·5·8·8·7
C. State Transporter's ID:
D. Transporter's Phone: (414) 257-2300

7. Transporter 2 Company Name:
8. US EPA ID Number:
E. State Transporter's ID:
F. Transporter's Phone:

9. Designated Facility Name and Site Address
Hydrite Chemical Co.
2815 WCF & N Drive
Waterloo, Iowa 50703
10. US EPA ID Number: I·A·T·2·0·0·0·1·0·5·9·3
G. State Facility's ID:
H. Facility's Phone: (319) 232-9731

	11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	HM	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	Waste Paint Related Material, Flammable Liquid, NA1263		0·0·4	D·M	·2·0·8·0	P	D001
b.							
c.							
d.							

J. Additional Descriptions for Materials Listed Above
Authorization # 9226-G-15662

K. Handling Codes for Wastes Listed Above:

15. Special Handling Instructions and Additional Information:

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.

Printed/Typed Name: Merle J. McMahon
Signature: Merle J. McMahon
Month: 8 Day: 25 Year: 88

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Mike Schoonover
Signature: Mike Schoonover
Month: 09 Day: 01 Year: 88

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name:
Signature:
Month: . Day: . Year: .

FACILITY

19. Discrepancy Indication Space:

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name: DENISE KNIGHT
Signature: Denise Knight
Month: 9 Day: 2 Year: 88

ORIGINAL - RETURN TO GENERATOR

WASTE MATERIAL DOCUMENT

HYDRITE CHEMICAL CO.

Oshkosh, WI (800) 242-8270
La Crosse, WI (608) 784-0024
Milwaukee, WI (414) 257-2300
Cottage Grove, WI (608) 257-5892
Waterloo, IA (319) 232-9731

AUTHORIZATION NO. _____ DATE _____

CUSTOMER _____

ADDRESS _____

_____

☐ DRUMS ☐ BULK ☐ DRUM LANCE

QUANTITY **DOT** PROPER SHIPPING NAME

_____ _____

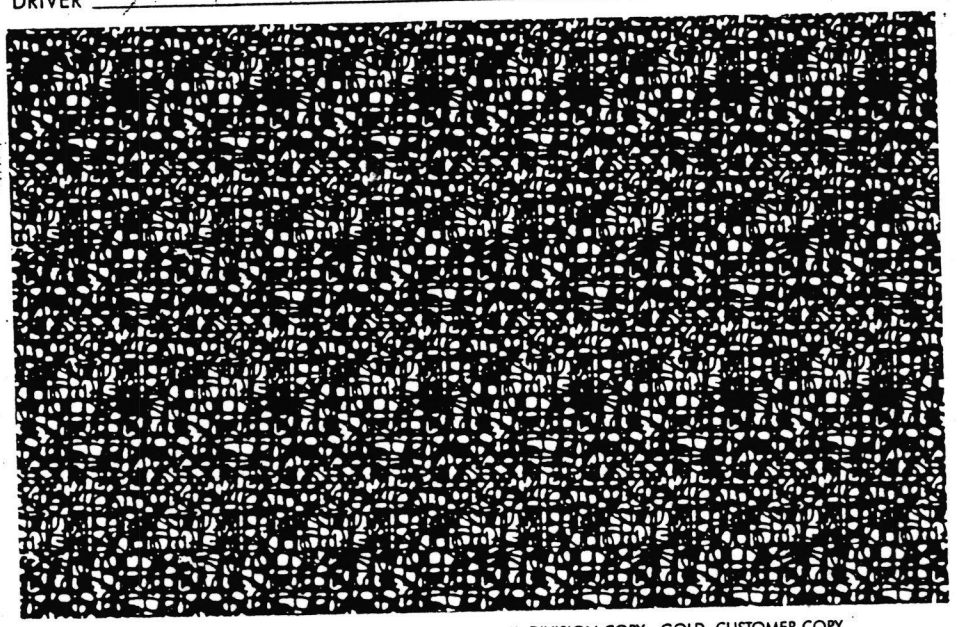
DOT HAZARD CLASS UN/NA NO.

_____ _____

This is to certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.

CUSTOMER SIGNATURE: _____

DRIVER _____ UNIT NO. _____



WHITE: SALES COPY YELLOW: PLANT COPY PINK: DIVISION COPY GOLD: CUSTOMER COPY

WMD12A7E3M

HYDRITE® CHEMICAL CO.

GENERIC PRODUCT LIST

Hydrite offers many of these products in different grades, forms, trade names and a variety of certifications. Please call us about your specific chemical requirements.

A
Acetic Acid
Acetone
Aircraft Deicing Fluids
Aluminum Brite Dips
Aluminum Sulfate (Alum)
Ammonium Bicarbonate
Ammonium Bifluoride
Ammonium Chloride
Ammonium Hydroxide
Ammonium Persulfate
Ammonium Sulfate
Antifoams
Antifreezes
Anhydrous Ammonia
Anodizing Chemicals
Aqua Ammonia Solution

B
Barium Carbonate
Battery Acid
Biocides
Bleach
Borax
Boric Acid
nButyl Acetate
nButyl Alcohol

C
Calcium Chloride (Dry & FG Liquid)
Calcium Hypochlorite
Caustic Potash
Caustic Soda
Chelating Agents
China Clay
Chlorine
Chromic Acid
Citric Acid
Carboxymethyl Cellulose
Cleaners
Copper Carbonate
Copper Cyanide
Copper Sulfate
Custom Compounds
Cyclohexane
Cyclohexanone

D
Dairy Cleaners & Sanitizers
Deinking Compounds
Diacetone Alcohol
Diammonium Phosphate
Dicalcium Phosphate
Diethanolamine
Diethyl Phthalate
Diethylene Glycol
Diethylethanolamine
Dimethyl Formamide
Dimethylethanolamine
Dioctyl Phthalate
Dipropylene Glycol
Disodium Phosphate
Dodecylbenzenesulfonic Acid (DDBSA)

E
Ethyl Acetate
Ethyl Alcohol (All Grades)
Ethylene Dichloride
Ethylene Glycol

F
Ferric Chloride
Filter Powders
Fluoboric Acid
Fluorocarbon Solvents
Food Processing Cleaners & Sanitizers
Formaldehyde
Formic Acid
Fumaric Acid
Furfuryl Alcohol

G
Gluconic Acid
Glycerine
Glycol Ether DB
Glycol Ether EB
Glycol Ether EE
Glycol Ether EE-AC
Glycol Ether EM

H
Heat Transfer Glycols
HAN — Heavy Aromatic Naphtha
Heptane
Hexylene Glycol
HTH
Hydrochloric Acid
Hydrofluoric Acid
Hydrofluosilicic Acid
Hydrogen Peroxide
Hydroxyacetic Acid

I
Inhibitors
Ink Oils
Iron Sulfate (Copperas)
Isobutyl Acetate
Isobutyl Alcohol
Isophorone
Isopropyl Acetate
Isopropyl Alcohol

L
Lactic Acid
Lime, Hydrated

M
Magnesium Chloride
Magnesium Oxide
Magnesium Sulfite
Metal Finishing Products
Methanol
Methyl Amyl Ketone (MAK)
Methyl Ethyl Ketone (MEK)
Methyl Isobutyl Ketone (MIBK)
Methylene Chloride
Methyl Pyrrolidone
Mineral Fillers
Mineral Seal Oil
Mineral Spirits
Mono-Isopropyl Amine
Monoammonium Phosphate
Monopotassium Phosphate
Monosodium Phosphate
Morpholine
Muriate of Potash
Muriatic Acid

N
Nickel Acetate
Nickel Carbonate
Nickel Chloride
Nickel Sulfate
Nitric Acid
NTA

O
Odorless Mineral Spirits
Oleic Acid
Oxalic Acid

P
Paint Strippers
Paper Mill Specialties
Paradichlorobenzene
Paraformaldehyde
Perchlorethylene
Phenol
Phosphoric Acid
Pickling Acid
Plating Products
Potassium Acetate
Potassium Bichromate
Potassium Carbonate
Potassium Chloride
Potassium Cyanide
Potassium Hydroxide
Potassium Metabisulfite
Potassium Permanganate
Potassium Sorbate
Potassium Sulfite
Potassium Tripolyphosphate
Primary Amyl Acetate
Process Oils
nPropyl Acetate
nPropyl Alcohol
Propylparaben, FG
Propylene Glycol

R
Recycled Solvents

S
Salt
Sanitizers
Scale Control Agents
Silicone Fluids & Emulsions
Soda Ash
Soda Crystals
Sodium Acetate
Sodium Acid Pyrophosphate
Sodium Benzoate
Sodium Bicarbonate
Sodium Bichromate
Sodium Bifluoride
Sodium Bisulfate
Sodium Busulfite (Dry & Liquids)
Sodium Carbonate
Sodium Chlorate
Sodium Chlorite
Sodium Citrate
Sodium Cyanide
Sodium Fluoride
Sodium Formate
Sodium Gluconate
Sodium Hexametaphosphate
Sodium Hydrosulfite
Sodium Hydrosulfide (Sodium Sulphydrate-NaSH)
Sodium Hydroxide
Sodium Hypochlorite
Sodium Hyposulfite
Sodium Metasilicate
Sodium Nitrate
Sodium Nitrite
Sodium Orthosilicate
Sodium Perborate
Sodium Sesquicarbonate
Sodium Silicates
Sodium Silicofluoride
Sodium Sulfate
Sodium Sulfite
Sodium Sulfide
Sodium Tetrasulfide
Sodium Thiosulfate
Sodium Tripolyphosphate
Sodium Xylene Sulfonate (SXS)
Solvent Recycling
Solvent Blends
100 Solvent
140 Solvent
150 Solvent
Stoddard Solvent
Sulfamic Acid
Sulfuric Acid
Sulfur Dioxide
Surfactants
Surface Active Agents

T
Tannery Specialties
Tetrapotassium Pyrophosphate
Tetrasodium Pyrophosphate
Thermofluids
Thickners
Toluol
Tricalcium Phosphate
1,1,1 Trichloroethane
Trichlorethylene
Triethanolamine
Triethylamine
Trisodium Phosphate
Trisodium Phosphate (Chlorinated)

U
Urea

V
VM&P Naphtha

W
Waste Solvent Acquisitions
White Oils

X
Xylol

Z
Zinc Chloride
Zinc Cyanide
Zinc Oxide

METAL FINISHING PROCESSES AND CHEMICALS

ZINC PLATING
- Acid Brightening Systems
- Alkaline Brightening Systems
- Cyanide Brightening Systems
- Cyanides
- Zinc Chloride
- Potassium Chloride

CHROME PLATING
- Econochrome Plating Systems
- Chromic Acid

NICKEL PLATING
- Nickel Chemicals (Dry & Liquid)
- Boric Acid
- Electroless Nickel Systems
- Brightening Systems

COPPER PLATING
- Cyanides
- Copper Sulfate
- Copper Brightening Systems

ALUMINUM FINISHING
- Brite Dips
- Phosphoric Acid
- Rinse Water Acquisition
- Anodizing Chemicals
- Dyes

CLEANERS
- Soak Cleaners
- Electro Cleaners
- Spray Cleaners
- Emulsion Cleaners
- Die-Cast Cleaners
- Acid Salts

PHOSPHATIZING PRODUCTS
- Iron Phosphates
- Zinc Phosphates
- Seals - Chrome & Non-chrome

WASTE TREATMENT
- Sodium Bisulfite (Liquid & Dry)
- Caustic Soda (Liquid & Dry)
- Sulfuric Acid
- Sulfur Dioxide
- Chlorine
- Bleach
- Aluminum Sulfate
- Copperas Iron Sulfate

ELECTROPOLISHING SYSTEMS
- Solutions
- Manual & Automated Equipment
- Turnkey Installations

PULP & PAPER

- Liquid Dechlorination and Reduction Chemicals
- Sulfite Cooking Liquors
- Waste Treatment Chemicals
- Deinking Compounds
- Biocides
- Felt Cleaners
- Boil-Out Compounds
- Solvents
- Commodity Chemicals
- Fire Retardants

FOOD PROCESSING SANITATION CHEMICALS

- Chelated Caustic Cleaners
- Foam Cleaning Systems
- Chlorinated Alkaline Cleaners
- Acid Deliming Cleaners
- General Purpose Cleaners
- Sanitizers
- Specialty Cleaners
- Sanitation Equipment Engineering

SOLVENT RECYCLING

- Specification Refined & Recycled Products
- Custom Recycling
- Fractional Distillation Service
- Organic Waste Solvent Acquisitions

HYDRITE® CHEMICAL CO.

CORPORATE OFFICE
2655 N. MAYFAIR RD.
P.O. BOX 13188 (53213)
MILWAUKEE, WI 53226

7300 W. BRADLEY RD.
MILWAUKEE, WI 53224

150 W. DONKLE ST.
P.O. BOX 189
COTTAGE GROVE, WI 53527

191 — 28TH AVE.
P.O. BOX 2763 (54903)
OSHKOSH, WI 54901

701 SUMNER ST.
P.O. BOX 12 (54602)
LA CROSSE, WI 54601

2815 WCF & N DRIVE
WATERLOO, IA 50703

HYDRITE® CHEMICAL CO.

Harold A. Fratzke

2815 WCF & N DRIVE
WATERLOO, IOWA 50703
319/232-9731
IA: 800/373-2925

AVGANIC INDUSTRIES INC
LABORATORY REPORT FORM

LAB ANALYSIS NR A008871

IDENTIFIERS

LAB TYPE	WSA	SALES LAB NR	S806060	BATCH NR	
PART NR	RWD00101	PCB NR		LOT NR	
WASTE MAST NR	00009226	INCOMING NR		CUSTOMER NR	
AUTHOR NR		RETAIN NR		OTHER NR	

COMPANY PRIES ENTERPRISES, INC. SALESPERSON FRATZKE BRANCH G

LABORATORY DATA

WASTE DENSITY	0.996	WASTE PH	6.10		
PRODUCT DENSITY	0.000	PROD PH	0.00		
TOTAL DISTILL	20/50	SOLIDS	NF		
% YIELD	0	% WATER KF	0.000000		
ACID ACCEPT	0.000	APHA COLOR			
% TOTAL CHLOR	0.00	PCB PPM	0		
BTU/LB		BTU/GAL			
ODOR					

DISTILLATION DATA

IBP	5% DIS	10% DIS
15% DIS	20% DIS	25% DIS
30% DIS	35% DIS	40% DIS
45% DIS	50% DIS	55% DIS
60% DIS	65% DIS	70% DIS
75% DIS	80% DIS	85% DIS
90% DIS	95% DIS	
		DP

CHLORIDE COMMENT

LABEL COMMENTS FLAMMABLE

COMMENTS INDEPENDENCE, IA
"PAINT CLEAN UP"
CONTAINS TRACES OF IBOUH.
1 MLS. FREE WATER IN DISTILLATE.

RECOMMENDATION DISPOSAL D-01

LAB ANALYSIS NR A008871

SOLVENT ANALYSIS

ALCOHOLS		DILUENTS, COND		ACTIVES, COND	
N-BUTANOL	4.0	STODDARD	0.0	GLYCOLETH,EE	0.0
ETHANOL	0.0	TOLUENE	1.0	GLYCOLETH,EEAC	0.0
ISOPROPANOL	2.0	XYLENE	77.5	GLYCOLETH,EM	0.0
N-PROPANOL	0.0	VMP NAPHTHA	0.5	GLYCOLETH,EMAC	0.0
ISOBUTANOL	0.0	CHLORINATEDS		GLYCOLETH,EP	0.0
METHANOL	7.5	MECL2	0.0	ISOBUOAC	0.0
DIACETONE ALC	0.0	PERC	0.0	ISOPROOAC	0.0
WATER	2.0	1,1,1	0.0	MEK	1.0
DILUENTS		112,122	0.0	MAK	0.0
CYCLOHEXANE	0.0	TRICHLOROETHYLEN	0.0	MIBK	0.0
CYCLOPENTANE	0.0	ACTIVES		DIBK	0.0
HEPTANE	0.0	ACETONE	0.0	N-PROOAC	0.0
HEXANE	0.0	N-BUOAC	0.0	GLYCOLETH,PM	0.0
LACTOL SP	0.0	EA	0.0	GLYCOLETH,PMA	0.0
MINERAL SP	0.0	GLYCOLETH,EEP	0.0	THF	0.0
100 SOLVENT	4.5	GLYCOLETH,EB	0.0	CYCLOHEXANONE	0.0
140 FL NAPH	0.0	GLYCOLETH,EBAC	0.0	NOS	0.0
150 SOLVENT	0.0				
PENTANE	0.0				

MATERIAL COMMENT XYLOL W. S.

CARBON COPY

ANALYZED BY RT

APPROVED BY

ANALYSIS DATE 88/06/20

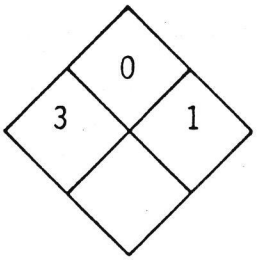
DOT PROPER SHIPPING NAME:
Waste Xylene Mixture
DOT HAZARD CLASS:
Flammable Liquid

UN/NA NUMBER:
UN1307
EPA WASTE CODE NO:
F003

MATERIAL SAFETY DATA SHEET

PARKER CHEMICAL COMPANY
32100 Stephenson Hwy., Madison Heights, Michigan 48071

Date: March 21, 1983



I. PRODUCT IDENTIFICATION:

Product Name: PARCO® CLEANER 334

Code Number: 01550

Identification: Cleaning Compound - Alkaline.

II. HEALTH HAZARD DATA

Emergency and First Aid Procedures

EYES: Immediately flush eyes in a directed stream of water for at least 15 minutes while forcibly holding eyelids apart to ensure complete irrigation of all eye and lid tissue. GET MEDICAL ATTENTION.

SKIN: Immediately remove contaminated clothing and shoes. Flush skin thoroughly with water for at least 15 minutes. Rinse clothing. If irritation persists, GET MEDICAL ATTENTION.

INGESTION: Drink large quantities of water. CORROSIVE. DO NOT INDUCE VOMITING. If vomiting occurs, drink more water. GET MEDICAL ATTENTION. Never give anything by mouth to an unconscious person.

Effects of Overexposure

Contact with eyes will cause severe burn and possible blindness.

Contact with skin or mucous membrane will cause severe burn and possible ulceration.

Precautions

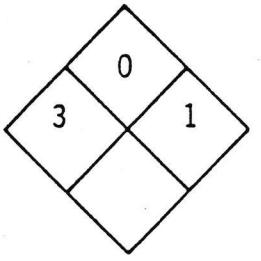
DO NOT GET IN EYES, ON SKIN OR ON CLOTHING.

DO NOT BREATHE DUST.

MATERIAL SAFETY DATA SHEET

PARKER CHEMICAL COMPANY
32100 Stephenson Hwy., Madison Heights, Michigan 48071

Date: March 21, 1983



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DO NOT BREATHE DUST.

Precautions (Cont'd.)

When making additions to a cold solution, add the dry chemical, slowly, to the surface of the solution while stirring the solution to dissolve the chemical and avoid spattering.

When making additions to a hot solution, add the chemical to cold water with stirring, cool or dilute and pour slowly into the hot solution while stirring the solution.

For industrial use only.

III. HAZARDOUS INGREDIENTS

Ingredients Presenting A Significant Hazard	%	TLV	CAS
Sodium hydroxide	75	2 mg/m^3	1310-73-2
Tetrasodium pyrophosphate	2	5 mg/m^3	7722-88-5
Sodium phosphate, dibasic	2	-	7558-79-4

IV. FIRE AND EXPLOSION HAZARD DATA

Flash Point: None.

Flammable Limits: Non-flammable.

Extinguishing Media: As required to extinguish surrounding fire.

Unusual Fire and Explosion Hazard: None.

V. SPECIAL PROTECTION

Respiratory: MSHA/NIOSH dust filter mask or respirator if dusting occurs.

Ventilation: As necessary to avoid inhalation and contact.

Protective Gloves: Neoprene or Plastic.

Eye and Face Protection: Chemical goggles, face shield.

Other Protective Equipment: As required to avoid contact.

Other Protective Equipment: Eye wash facility and emergency shower should be in close proximity.

X. REGULATORY STATUS

Clean Water Act

Toxic Pollutant List (Sec. 307): Does not contain any chemical(s)/ compound(s) which are included on this list.

Designated Hazardous Substances (Sec. 311): Contains the following chemical(s)/compound(s) which are included on this list.

Sodium hydroxide and Sodium phosphate, dibasic

Reportable Quantity: 1,333 pounds.

Based on the reporting requirements for sodium hydroxide.

Department of Transportation:

This chemical is regulated by the Department of Transportation.

Proper Shipping Name: Corrosive Solid, N.O.I., UN 1759.

D.O.T. Hazardous Classification: Corrosive Material.

Department of Transportation Label: Corrosive.

Prepared By: S. Whitney

VI. PHYSICAL DATA

Solubility in water: Complete.

Appearance and Odor: White powder with mild alcoholic odor.

pH: ~13 (1% solution)

VII. REACTIVITY DATA

Stability: Stable.

Incompatibility: Keep separate from acids.

Hazardous Decomposition Products: None.

Hazardous Polymerization: Will not occur.

VIII. HANDLING AND STORAGE:

We recommend that ALL CHEMICALS be stored and used in locations which will not permit direct access to sanitary or surface drains. These areas should be constructed in such a manner that any chemicals lost can be either salvaged or suitably treated to prevent pollution.

Store drums in a ventilated area away from direct heat and separate from acids.

IX. SPILL, LEAK AND DISPOSAL PROCEDURES

Steps To Be Taken In Case Material is Released or Spilled:

Wear protective clothing; respirator.

Sweep up or otherwise collect and store in suitable drum.

Flush the contaminated area with water.

Waste Disposal Method:

This chemical does not exhibit any of the characteristics of hazardous waste as defined in Title 40 Code of Federal Regulations 261.3. However, this chemical contains a significant amount of sodium hydroxide and it is recommended that it be disposed as a hazardous waste exhibiting the characteristic of corrosivity (40 CFR 261.22).

This chemical contains phosphates and sodium hydroxide. Waste treatment and neutralization may be required prior to discharge to sewer.

Wastewater treatment sludges from electroplating (metal treating) operations are normally hazardous waste unless delisted or excepted. (40 Code of Federal Regulations 261.3)

Waste Treatment Information Bulletin: No. 1007
(Available on request).

CUSTOMER COPY

No. 02076

Northland Products Company

1000 RAINBOW DRIVE
POST OFFICE BOX 418
WATERLOO, IOWA 50704
319—234-5585

SOLD TO: Pries Enterprises Inc.
Box 777, 701 17th St. S.E.
Independence, IA. 50644

SHIP TO:

Phone: 319-334-7060

DATE: 12-16-88

Parts Cleaner Service Contract

QUANTITY	SIZE	CYCLE	DESCRIPTION	SERIAL NO.	PRICE
1	DM-30	BWK	PARTSWASHER	R2289	54.50
			Tax.		2.18
			Charge on Account.		#56.68
			2nd Service free		

This is a bailment and is not to be construed as a sale contract or a conditional sale contract. The intent is that Owner is hereby renting and leasing the Equipment only. It is understood and agreed the Equipment shall remain personal property at all times, notwithstanding the manner of its annexations to realty. The Lease is personal to the Lessee; no rights hereunder may be transferred without Owner's written consent.

The Equipment to this Lease includes all replacement parts, additions and accessories.

For consideration received, Northland Products Company, hereafter N.P.C., agrees to deliver to customer herein named, on or about the date described, the number and size of units so described on the service agreement. All units are to be in new condition and fully operational upon delivery. Further, N.P.C. agrees to service all units in the weekly schedule described.

Customer agrees to pay N.P.C. the price described above per unit per service. Payment is to be made at time of service or 30 days thereafter. Customer agrees to allow N.P.C. representatives resonable access to service, inspect and/or repair the units. Customer and his representatives agree to use the parts cleaners in a normal and reasonable manner and will be responsible for repairs or replacement of units physically damaged. Customer agrees to be responsible for the physical safety of the N.P.C. Parts Cleaners in his custody and agrees to reimburse N.P.C. the sum of $339.00 per unit for each unit lost or destroyed by fire, theft, vandalism, or physically damaged beyond repair.

Customer shall keep the equipment free from claims, liens, encumbrances and security interests. Customer, at its own cost, shall insure the equipment against burglary, theft, fire and vandalism in the amount of $339.00. Bailment or lease terminates upon default in payments, bankruptcy of the bailee/lessee, appointment of receivor for the business of bailee/lessee, or discontinuation of bailee's/lessee's business.

Customer may cancel this agreement at any time provided immediate notice is given to N.P.C., but in such event, customer shall pay all monies owed N.P.C. and shall immediately deliver to N.P.C. equipment previously received by it from N.P.C.

Customer agrees to assume any tax that may be assessed on use of cleaning units by any governmental agency during the term of this agreement. Customer shall indemnify and save N.P.C. harmless from any and all liabilities arising from use of cleaning units. In the event the Customer fails to make timely payments of the service charge, or this service agreement is terminated, N.P.C. will be allowed to remove all Northland Products Company Parts Cleaners from the Customer's premises without further action.

Prices subject to change without notice.

CUSTOMER AUTHORIZATION

X Dennis D. Sox 12/16/88
SIGNED DATE

NORTHLAND SALESMAN APPROVAL

Steven A. Christensen 12-16-88
SIGNED DATE

10-1

MATERIAL SAFETY DATA SHEET

NORTHLAND PRODUCTS COMPANY
P.O.BOX 418 1000 RAINBOW DR.
WATERLOO,IA 50704 PHONE: (319)234-5586

MSDS FILE CODE:SOLV

PRODUCT DESCRIPTION(S): MINERAL SPIRITS
REVISION DATE: 4/23/87
EMERGENCY PHONE: CHEMTREC (800)424-9300
CHEMICAL NAME: PETROLEUM HYDROCARBONS: SOLVENT
TRADE NAME(S): STODDARD SOLVENT - PARTS CLEANER SOLVENT
NORSOLV
NFPA CODE - HEALTH: 1 FIRE: 2 REACTIVITY: 0

SECTION 1 - COMPONENTS AND HAZARD INFORMATION

COMBUSTIBLE LIQUID

MINERAL SPIRITS 100 % TLV= NONE ESTAB. PEL= NONE ESTAB.
CAS # 8030-30-6
THIS PRODUCT DOES NOT CONTAIN ANY KNOWN OR POTENTIAL CARCINOGENS AS LISTED IN NTP, IARC, OR OSHA.

SECTION 2 - FIRE AND EXPLOSION HAZARDS

FLASH POINT:	105 DEGREES F. (TCC)
UPPER FLAMMABLE LIMIT:	< 5.0 (% VOLUME)
LOWER FLAMMABLE LIMIT:	< 1.0 (% VOLUME)
EXTINGUISHING MEDIA:	WATER FOG, FOAM, DRY CHEMICAL OR CO2
SPECIAL FIREFIGHTING PROCEDURES:	WATER SPRAY MAY BE INEFFECTIVE, BUT MAY BE USED TO COOL EXPOSED CONTAINERS.
UNUSUAL FIRE & EXPLOSION HAZARDS:	COMBUSTIBLE LIQUID. VAPOR ACCUMALATION MAY FLASH AND/OR EXPLODE IF IGNITED.

SECTION 3 - HEALTH HAZARD DATA

ORAL TOXICITY:	MAY CAUSE DIZZINESS AND HEADACHE, LEADING TO UNCONSCIOUSNESS.
EYE IRRITATION:	MAY CAUSE SLIGHT IRRITATION AND/OR CONJUNCTIVITIS.
SKIN IRRITATION:	MAY CAUSE SKIN DEFATTING AND DERMATITIS.
OTHER:	INHALATION MAY CAUSE NOSE AND THROAT IRRITATION.
TLV:	100 PPM RECOMMENDED(ACGIH 1985-86)

DATA SOURCE: BASED ON DATA FROM COMPONENTS.

EMERGENCY FIRST AID PROCEDURES

SKIN:	REMOVE CONTAMINATED CLOTHING. WASH WITH SOAP AND WATER.
EYE:	FLUSH WITH WATER, 15 MINUTES. CALL PHYSICIAN IF IRRITATION PERSISTS.
INHALATION:	REMOVE TO FRESH AIR, GIVE OXYGEN IF BREATHING HARD. CALL PHYSICIAN.
ORAL:	DO NOT INDUCE VOMITING. CALL PHYSICIAN IMMEDIATELY.

SECTION 4 - SPECIAL PROTECTION INFORMATION

VENTILATION PROCEDURE:	USE MECHANICAL VENTING WHEN VAPORS ARE CONCENTRATED.
GLOVES PROTECTION:	USE OF NEOPRENE OR NITRILE RUBBER GLOVES RECOMMENDED.
EYE PROTECTION:	USE CHEMICAL SAFETY GLASSES OR GOGGLES.
OTHER PROTECTION:	EYE WASH STATION,RUBBER APRON,PROTECTIVE CLOTHING.

Northland Products Company
1000 Rainbow Drive, P.O. Box 418
Waterloo, Iowa 50704

Please print or type
(Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. . . . . Manifest Document No. 15578

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
HAWKEYE ALUMINUM
701 17TH STREET, S.E.
POST OFFICE BOX 777
INDEPENDENCE, IOWA
50648

4. Generator's Phone ( )

A. State Manifest Document Number

B. State Generator's ID

5. Transporter 1 Company Name
Northland Products Company

US EPA ID Number
I.A.D.0.2.2.3.6.5.4.8.0

C. State Transporter's ID

D. Transporter's Phone 319-234-5585

7. Transporter 2 Company Name

8. UA EPA ID Number . . . . . .

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
Northland Products Company
1000 Rainbow Drive
Waterloo, Iowa 50704

10. US EPA ID Number
I.A.D.0.2.2.3.6.5.4.8.0

G. State Facility's ID

H. Facility's Phone
319-234-5585

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	HM	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. Petroleum Naptha, Combustible Liquid EPA Haz Class: D001 DOT ID No.: UN1255	X	1	DRUMS	18	GAL.	
b. Methylene Chloride ORM-A EPA Haz Class: F001 DOT ID No.: Un1953	X		PAILS		GAL.	
c. Paint Related Material, Corrosive EPA Haz Class: F001 DOT ID No.: NA1760	X		PAILS		GAL.	
d.						

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

A. Material hazardous due to its ignitability. Protect from ignition sources including but not limited to: Open flames, smoking, cutting & welding, hot surfaces, frictional heat and sparks. B. Material contains a low percentage of components which are corrosive. Minimum skin contact as well as good personal hygiene standards should be observed. Use in areas of adequate ventilation.

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.

GENERATOR

Printed/Typed Name: HAWKEYE ALUMINUM

Signature: Terry D Carroll

Month Day Year: 06 09 89

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: Northland Products Company

Signature: Steve Andersen

Month Day Year: 06 09 89

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name:

Signature:

Month Day Year: . . . .

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name: Northland Products Company

Signature: Steve Andersen

Month Day Year: 06 09 89

EPA Form 8700-22 (Rev.4-85) Previous edition is obsolete.

RETAIN THIS DOCUMENT FOR 3 YEARS

ORIGINAL - RETURN TO GENERATOR

7-BLS

SECTION 5 - PHYSICAL DATA

VAPOR PRESSURE:	<10 MMHG @ 25C.
SPECIFIC GRAVITY:	0.784 @ 60
WATER SOLUBILITY:	NEGLIGIBLE
PERCENT VOLATILE:	100%
VAPOR DENSITY:	4.83 (AIR=1)
EVAPORATION RATE:	NOT DETERMINED
ODOR:	SLIGHT PETROLEUM ODOR
APPEARANCE:	CLEAR GREEN LIQUID.

SECTION 6 - STABILITY

STABILITY:	STABLE
INCOMPATIBILITY:	STRONG OXIDIZING AGENTS,ACIDS,ALKALIES.
POLYMERIZATION:	WILL NOT OCCUR
THERMAL DECOMPOSITION:	MAY PRODUCE CARBON MONOXIDE, CARBON DIOXIDE AND UNIDENTIFIABLE ORGANIC MATERIALS.

SECTION 7 - SPILL OR LEAK PROCEDURES

WEAR CHEMICAL SPLASH GOGGLES AND RUBBER BOOTS. PREVENT ENTRY INTO SEWERS AND WATERWAYS. PUMP OR ABSORB ON INERT MATERIAL AND DISPOSE IN ACCORDANCE WITH FEDERAL, STATE AND LOCAL LAWS. ANY SPILL ENTERING SURFACE OR SUBSURFACE WATERS MUST BE REPORTED TO THE NATIONAL RESPONSE CENTER IMMEDIATELY. (800)424-8802

SECTION 8 - SPECIAL PRECAUTIONS

AVOID PROLONGED AND REPEATED CONTACT.
STORE AWAY FROM IGNITION SOURCES. AVOID PHYSICAL DAMAGE.

SECTION 9 - TRANSPORTATION AND LABELING

DOT PROPER SHIPPING NAME:	PETROLEUM NAPTHA
DOT HAZARD CLASS:	COMBUSTIBLE LIQUID
DOT ID NUMBER (UN NO.):	UN 1255
EPA HAZARDOUS SUBSTANCES:	D001
PRECAUTIONARY LABELS:	CAUTION! COMBUSTIBLE

Northland Products Company
1000 Rainbow Drive, P.O. Box 418
Waterloo, Iowa 50704

Please print or type
(Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. . . . . Manifest Document No. 17242
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
HAWKEYE ALUMINUM, 701 17TH STREET, S.E.
POST OFFICE BOX 777
INDEPENDENCE, IOWA 50646

4. Generator's Phone ( )

A. State Manifest Document Number

B. State Generator's ID

5. Transporter 1 Company Name: Northland Products Company
US EPA ID Number: I.A.D.0.2.2.3.6.5.4.8.0

C. State Transporter's ID

D. Transporter's Phone: 319-234-5585

7. Transporter 2 Company Name

8. UA EPA ID Number . . . . . .

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
Northland Products Company
1000 Rainbow Drive
Waterloo, Iowa 50704

10. US EPA ID Number
I.A.D.0.2.2.3.6.5.4.8.0

G. State Facility's ID

H. Facility's Phone: 319-234-5585

	11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	Petroleum Naptha, Combustible Liquid EPA Haz Class: D001 DOT ID No.: UN1255	X	1	DRUMS	12	GAL.	
b.	Methylene Chloride ORM-A EPA Haz Class: F001 DOT ID No.: Un1953	X		PAILS		GAL.	
c.	Paint Related Material, Corrosive EPA Haz Class: F001 DOT ID No.: NA1760	X		PAILS		GAL.	
d.							

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

A. Material hazardous due to its ignitability. Protect from ignition sources including but not limited to: Open flames, smoking, cutting & welding, hot surfaces, frictional heat and sparks. B. Material contains a low percentage of components which are corrosive. Minimum skin contact as well as good personal hygiene standards should be observed. Use in areas of adequate ventilation.

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.

Printed/Typed Name: HAWKEYE ALUMINUM
Signature: Jerry D Cornwell
Month 5 Day 30 Year 89

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: Northland Products Company
Signature: J Walker
Month 5 Day 30 Year 89

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name
Signature
Month . Day . Year .

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name: Northland Products Company
Signature: J Walker
Month 5 Day 30 Year 89

EPA Form 8700-22 (Rev.4-85) Previous edition is obsolete.

RETAIN THIS DOCUMENT FOR 3 YEARS

7-BLS

ORIGINAL - RETURN TO GENERATOR

11-2

Northland Products Company
1000 Rainbow Drive, P.O. Box 418
Waterloo, Iowa 50704

Please print or type
(Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. . . . . Manifest Document No. 18311
2. Page 1 of 1 — Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
HAWKEYE ALUMINUM
701 17TH STREET, S.E.
POST OFFICE BOX 777
INDEPENDENCE, IOWA 50644

4. Generator's Phone (319 334-7068

A. State Manifest Document Number

B. State Generator's ID

5. Transporter 1 Company Name: **Northland Products Company**
US EPA ID Number: I.A.D.0.2.2.3.6.5.4.8.0
C. State Transporter's ID
D. Transporter's Phone: 319-234-5585

7. Transporter 2 Company Name
8. UA EPA ID Number . . . . .
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address
Northland Products Company
1000 Rainbow Drive
Waterloo, Iowa 50704
10. US EPA ID Number: I.A.D.0.2.2.3.6.5.4.8.0
G. State Facility's ID
H. Facility's Phone: 319-234-5585

	11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	Petroleum Naptha, Combustible Liquid EPA Haz Class: D001 DOT ID No.: UN1255	X	1	DRUMS	16	GAL.	
b.	Methylene Chloride ORM-A EPA Haz Class: F001 DOT ID No.: Un1953	X		PAILS		GAL.	
c.	Paint Related Material, Corrosive EPA Haz Class: F001 DOT ID No.: NA1760	X		PAILS		GAL.	
d.							

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
A. Material hazardous due to its ignitability. Protect from ignition sources including but not limited to: Open flames, smoking, cutting & welding, hot surfaces, frictional heat and sparks. B. Material contains a low percentage of components which are corrosive. Minimum skin contact as well as good personal hygiene standards should be observed. Use in areas of adequate ventilation.

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.

GENERATOR

Printed/Typed Name: HAWKEYE ALUMINUM
Signature: Terry Bush
Month Day Year: 7 26 89

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: **Northland Products Company**
Signature: Steve Kammeyer
Month Day Year: 7 26 89

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name
Signature
Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: **Northland Products Company**
Signature: Steve Kammeyer
Month Day Year: 7 26 89

EPA Form 8700-22 (Rev. 4-85) Previous edition is obsolete.

RETAIN THIS DOCUMENT FOR 3 YEARS

7-BLS

ORIGINAL - RETURN TO GENERATOR

Northland Products Company
1000 Rainbow Drive, P.O. Box 418
Waterloo, Iowa 50704

Please print or type
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Form Approved. OMB No. 2050-0039. Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. . . . . Manifest Document No. 19239

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
HAWKEYE ALUMINUM
701 17TH STREET, S.E.
POST OFFICE BOX 777
INDEPENDENCE, IOWA 50644

4. Generator's Phone (319 334--7068

A. State Manifest Document Number

B. State Generator's ID

5. Transporter 1 Company Name
Northland Products Company

US EPA ID Number
I.A.D.0.2.2.3.6.5.4.8.0

C. State Transporter's ID

D. Transporter's Phone 319-234-5585

7. Transporter 2 Company Name

8. UA EPA ID Number
. . . . . .

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
Northland Products Company
1000 Rainbow Drive
Waterloo, Iowa 50704

10. US EPA ID Number
I.A.D.0.2.2.3.6.5.4.8.0

G. State Facility's ID

H. Facility's Phone
319-234-5585

GENERATOR

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. Petroleum Naptha, Combustible Liquid EPA Haz Class: D001 DOT ID No.: UN1255	X	1	DRUMS	16	GAL.	
b. Methylene Chloride ORM-A EPA Haz Class: F001 DOT ID No.: Un1953	X		PAILS		GAL.	
c. Paint Related Material, Corrosive EPA Haz Class: F001 DOT ID No.: NA1760	X		PAILS		GAL.	
d.						

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

A. Material hazardous due to its ignitability. Protect from ignition sources including but not limited to: Open flames, smoking, cutting & welding, hot surfaces, frictional heat and sparks. B. Material contains a low percentage of components which are corrosive. Minimum skin contact as well as good personal hygiene standards should be observed. Use in areas of adequate ventilation.

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Printed/Typed Name	Signature	Month	Day	Year
HAWKEYE ALUMINUM	Jerry D Cornwell	7	2	85

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
Northland Products Company		9	21	85

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
		.	.	.

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day	Year
Northland Products Company		9	21	85

EPA Form 8700-22 (Rev 4-85) Previous edition is obsolete.

RETAIN THIS DOCUMENT FOR 3 YEARS

7-BLS

ORIGINAL - RETURN TO GENERATOR

11-4

Northland Products Company
1000 Rainbow Drive, P.O. Box 418
Waterloo, Iowa 50704

Please print or type
(Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. . . . . Manifest Document No. 21257

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
HAWKEYE ALUMINUM
701 17TH STREET, S.E.
POST OFFICE BOX 777
INDEPENDENCE, IOWA

4. Generator's Phone (319 334)-7068

A. State Manifest Document Number

B. State Generator's ID

5. Transporter 1 Company Name
Northland Products Company

6. US EPA ID Number
I.A.D.0.2.2.3.6.5.4.8.0

C. State Transporter's ID

D. Transporter's Phone 319-234-5585

7. Transporter 2 Company Name

8. UA EPA ID Number . . . . . .

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
Northland Products Company
1000 Rainbow Drive
Waterloo, Iowa 50704

10. US EPA ID Number
I.A.D.0.2.2.3.6.5.4.8.0

G. State Facility's ID

H. Facility's Phone
319-234-5585

	11 US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM		12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	X	Petroleum Naptha, Combustible Liquid EPA Haz Class: D001 DOT ID No.: UN1255	1	DRUMS	17	GAL.	
b.	X	Methylene Chloride ORM-A EPA Haz Class: F001/F003/F004 DOT ID No.: Un1953		PAILS		GAL.	
c.							
d.							

J. Additional Descriptions for Materials Listed Above
LAND DISPOSAL RESTRICTION NOTIFICATION: This serves as notification that the above-referenced Methylene Chloride waste stream, EPA class F001/F004, is a land disposal restricted waste as set forth by EPA regulations 40 CFR part 268. The following constituents and treatment standards apply to this waste stream; Methylene Chloride (0.96 Mg/L); Cresols and Cresylic acid (0.75 Mg/L); Tetrachloroethylene (0.05 Mg/L); Xylene (0.15 Mg/L).

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
A. Material hazardous due to its ignitability. Protect from ignition sources including but not limited to: Open flames, smoking, cutting & welding, hot surfaces, frictional heat and sparks. B. Material contains a low percentage of components which are corrosive. Minimum skin contact as well as good personal hygiene standards should be observed. Use in areas of adequate ventilation.

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If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; **OR**, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

GENERATOR

Printed/Typed Name: HAWKEYE ALUMINUM
Signature: Jerry D Cornwell
Month . Day . Year .

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Northland Products Company
Signature: Steve Kammeyer
Month 11 Day 05 Year 89

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name:
Signature:
Month . Day . Year .

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: Northland Products Company
Signature: Steve Kammeyer
Month 11 Day 05 Year 89

EPA Form 8700-22 (Rev. 9-88) Previous edition is obsolete.

RETAIN THIS DOCUMENT FOR 3 YEARS

7-BLS-C5

ORIGINAL - RETURN TO GENERATOR

Northland Products Compan
1000 Rainbow Drive, P.O. Box 418
Waterloo, Iowa 50704

Please print or type
(Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. . . . . Manifest Document No. 22212

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
HAWKEYE ALUMINUM
701 17TH STREET, S.E.
POST OFFICE BOX 777
INDEPENDENCE, IOWA
50644

4. Generator's Phone (319 334-7068)

A. State Manifest Document Number

B. State Generator's ID

5. Transporter 1 Company Name
Northland Products Company

6. US EPA ID Number
I.A.D.0.2.2.3.6.5.4.8.0

C. State Transporter's ID

D. Transporter's Phone 319-234-5585

7. Transporter 2 Company Name

8. UA EPA ID Number . . . . . .

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
Northland Products Company
1000 Rainbow Drive
Waterloo, Iowa 50704

10. US EPA ID Number
I.A.D.0.2.2.3.6.5.4.8.0

G. State Facility's ID

H. Facility's Phone 319-234-5585

	11 US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	Petroleum Naptha, Combustible Liquid EPA Haz Class: D001 DOT ID No.: UN1255	X	1	DRUMS	18	GAL.	
b.	Methylene Chloride ORM-A EPA Haz Class: F001/F003/F004 DOT ID No.: Un1953	X		PAILS		GAL.	
c.							
d.							

J. Additional Descriptions for Materials Listed Above
LAND DISPOSAL RESTRICTION NOTIFICATION: This serves as notification that the above-referenced Methylene Chloride waste stream, EPA class F001/F004, is a land disposal restricted waste as set forth by EPA regulations 40 CFR part 268. The following constituents and treatment standards apply to this waste stream: Methylene Chloride (0.96 Mg/L); Cresols and Cresylic acid (0.75 Mg/L); Tetrachloroethylene (0.05 Mg/L); Xylene (0.15 Mg/L)

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
A. Material hazardous due to its ignitability. Protect from ignition sources including but not limited to: Open flames, smoking, cutting & welding, hot surfaces, frictional heat and sparks. B. Material contains a low percentage of components which are corrosive. Minimum skin contact as well as good personal hygiene standards should be observed. Use in areas of adequate ventilation.

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; **OR**, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

GENERATOR

Printed/Typed Name: HAWKEYE ALUMINUM
Signature: William Hall
Month . Day . Year .

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Northland Products Company
Signature: Steve Kammeyer
Month 1 Day 10 Year 90

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name:
Signature:
Month . Day . Year .

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: Northland Products Company
Signature: Steve Kammeyer
Month 1 Day 10 Year 90

EPA Form 8700-22 (Rev. 9-88) Previous edition is obsolete.

RETAIN ~~THIS~~ DOCUMENT FOR 3 YEARS

7-BLS-C5

ORIGINAL - RETURN TO GENERATOR

3143401

Please print or type
(Form designed for use on elite (12-pitch) typewriter.)

Northland Products Company
1000 Rainbow Drive, P.O. Box 418
Waterloo, Iowa 50704

Form Approved. OMB No. 2050-0039. Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. . . . . Manifest Document No. 23205
2. Page 1 of 1 — Information in the shaded areas is not required by Federal law.

GENERATOR

3. Generator's Name and Mailing Address
HAWKEYE ALUMINUM
701 17TH STREET, S.E.
POST OFFICE BOX 777
INDEPENDENCE, IOWA 50646

4. Generator's Phone (319 334-7068

A. State Manifest Document Number

B. State Generator's ID

5. Transporter 1 Company Name: **Northland Products Company**
6. US EPA ID Number: I.A.D.0.2.2.3.6.5.4.8.0
C. State Transporter's ID
D. Transporter's Phone: 319-234-5585

7. Transporter 2 Company Name
8. UA EPA ID Number . . . . . .
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address
Northland Products Company
1000 Rainbow Drive
Waterloo, Iowa 50704
10. US EPA ID Number: I.A.D.0.2.2.3.6.5.4.8.0
G. State Facility's ID
H. Facility's Phone: 319-234-5585

	11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	Petroleum Naptha, Combustible Liquid EPA Haz Class: D001 DOT ID No.: UN1255	X	001	DRUMS	00019	GAL.	
b.	Methylene Chloride ORM-A EPA Haz Class: F001/F003/F004 DOT ID No.: Un1953	X		PAILS		GAL.	
c.							
d.							

J. Additional Descriptions for Materials Listed Above
LAND DISPOSAL RESTRICTION NOTIFICATION: This serves as notification that the above-referenced Methylene Chloride waste stream, EPA class F001/F004, is a land disposal restricted waste as set forth by EPA regulations 40 CFR part 268. The following constituents and treatment standards apply to this waste stream: Methylene Chloride (0.96 Mg/L); Cresols and Cresylic acid (0.75 Mg/L); Tetrachloroethylene (0.05 Mg/L); Xylene (0.15 Mg/L).

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
A. Material hazardous due to its ignitability. Protect from ignition sources including but not limited to: Open flames, smoking, cutting & welding, hot surfaces, frictional heat and sparks. B. Material contains a low percentage of components which are corrosive. Minimum skin contact as well as good personal hygiene standards should be observed. Use in areas of adequate ventilation.

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; **OR**, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: HAWKEYE ALUMINUM — Signature: [signature] — Month Day Year: 10 31 90

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: **Northland Products Company** — Signature: Steve Rammeyer — Month Day Year: 10 31 90

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name — Signature — Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: **Northland Products Company** — Signature: [signature] — Month Day Year: 10 30 90

EPA Form 8700-22 (Rev. 9-88) Previous edition is obsolete.

RETAIN THIS DOCUMENT FOR 3 YEARS

7-BLS-C5

ORIGINAL - RETURN TO GENERATOR

11-7

:FR, Part 265

RCRA COMPLIANCE INSPECTION REPORT Pines
INTERIM STATUS FACILITY'S CHECKLIST

Section A - General Facility Standards

§265.11 1. Does facility have an EPA Identification No.? ✓ Yes ___ No

a. If yes, EPA I.D. No. _____
b. If no, explain _____

§265.12 2. Has facility received hazardous waste from a foreign source? ___ Yes ✓ No

General Waste Analysis

§265.13 3. Has facility obtained detailed chemical and physical data of waste prior to treatment, storage or disposal? ✓ Yes ___ No

a. Was data determined from:
(1) Knowledge of processes/wastes? ___ Yes ___ No
(2) Actual analysis of representative sample? ✓ Yes ___ No

b. Are analysis repeated as necessary to ensure data is accurate and up-to-date? ___ Yes ___ No

c. (For off-site facility) Does owner/operator inspect and, if necessary, analyze each waste movement received? ___ Yes ___ No

4. Does facility have a written waste analysis plan? ___ Yes ✓ No

a. Is the plan kept at the facility? ___ Yes ___ No

b. Does the plan include:

(1) Parameters for which each waste will be analyzed? ___ Yes ___ No

(2) Test methods used to test for these parameters? ___ Yes ___ No

(3) Sampling method used to obtain sample? ___ Yes ___ No

(4) Frequency with which initial analyses will be reviewed or repeated? ___ Yes ___ No

(5) (For off-site facility) Waste analysis that generators have agreed to supply? ___ Yes ___ No

(6) (For off-site facility) Procedures which are used to inspect and, if necessary, analyze each movement of hazardous waste received including: ___Yes___No

(a) Procedures used to determine the identity of each movement of waste? ___Yes___No

(b) Sampling method to obtain representative sample of waste to be identified ___Yes___No

Security

§265.14 5. Does the facility provide adequate security through:

a. 24-hour surveillance system? (e.g. television monitoring or guards) ___Yes___No

OR

b. Artificial or natural barrier around facility (e.g. ~~fence~~ or fence and cliff)? ✓Yes___No
Describe ~~[illegible]~~ storage area was inside the building

And means to control entry through entrances (e.g. attendant, television monitors, locked ~~entrance,~~ controlled roadway access)? ✓Yes___No
Describe___

c. Are signs with the legend, "Danger - Unauthorized Personnel Keep Out" posted? ___Yes ✓No

General Inspection Requirements

§265.15 6. Does the owner/operator maintain a written schedule at the facility? ___Yes ✓No

a. Does the schedule include the inspection of:

(1) Monitoring equipment? ___Yes___No

(2) Safety and emergency equipment? ___Yes___No

(3) Security devices? ___Yes___No

(4) Operating and structural equipment? ___Yes___No

b. Does the schedule identify the types of problems to be looked for? ___Yes___No

7. Does the owner/operator maintain an inspection log? ___Yes ___No

a. Does it include:

(1) Date and time of inspection? ___Yes ___No

(2) Name of inspector? ___Yes ___No

(3) Notation of observation? ___Yes ___No

(4) Date and nature of repairs or remedial action? ___Yes ___No

b. Are there any malfunctions or other deficiencies not corrected? (Use narrative explanation sheet).

Personnel Training

§265.16 8. Does facility have a training program? ___Yes ___No

a. Are the following records maintained?

(1) Job title and name of individual filling each job? ___Yes ___No

(2) Written description of each job? ___Yes ___No

(3) Written description of type and amount of training to be given? ___Yes ___No

(4) Documentation of training given? ___Yes ___No

b. Is an annual review of training accomplished? ___Yes ___No

c. Are the training records maintained at the facility? ___Yes ___No

d. How long are records kept for:

1) Current employees? _____

2) Former employees? _____

Requirements for Ignitable, Reactive or Incompatible Wastes

§265.17 9. Does facility handle ignitable or reactive wastes? ___Yes ___No

a. If yes, is waste separated and protected from sources of ignition or reaction: open flames, smoking, cutting and welding, hot surfaces, frictional heat,

sparks (static, electrical or mechanical), spontaneous ignition; e.g. from heat-producing chemical reactions, and radiant heat? Is maintained in the parts washer until serviced by Northland ___Yes___No

1) If yes, use narrative explanations sheet to describe separation and protection measures.

2) If no, use narrative explanations sheet to describe sources of ignition or reaction? ___Yes___No

b. Are smoking and open flame confined to specifically designed locations? ___Yes___No

c. Are "No Smoking" signs posted in hazardous areas? /Yes___No

---

Section B - Preparedness and Prevention

§265.31 1. Is there evidence of fire, explosion or contamination of the environment? See NP where old NaOH tank was stored outside /Yes___No

If yes, use narrative explanation sheet to explain.

§265.32 2. Is the facility equipped with (as appropriate)

a. Internal communication or alarm system? ___Yes/No

b. Telephone or two-way radio to call emergency response personnel? /Yes___No

c. Portable ~~fire extinguishers,~~ fire control equipment, spill control equipment and decontamination equipment? /Yes___No

d. Water of adequate volume and pressure for hoses, sprinklers or water spray systems? /Yes___No

Describe source of water City

---

§265.33 3. Are all communications or alarm systems, fire protection equipment, spill control equipment and decontamination equipment where required, tested and maintained to assure proper operation? fire ext, ng /Yes___No

§265.34 4. Are communications or alarm systems, where required, readily accessible? currently no stg on site ___Yes___No

§265.35 5. Is there sufficient aisle space to allow unobstructed movement of personnel and equipment in an emergency? N/A ___Yes___No

§265.37

6. Has the owner/operator attempted to make the following arrangements with the local authorities as appropriate:

a. To familiarize police, fire departments and emergency response teams with layout of facility, properties of hazardous waste handled and associated hazards, places where personnel would normally be working, entrances to roads inside facility and possible evacuation routes? fire dept visited sent list of chems ✓ Yes ___ No

b. In ther case where more than one police and fire department might respond, agreements designating primary emergency authority? the local call other Speed. help departments ___ Yes ___ No

c. Agreements with State emergency response teams, emergency response contractors and equipment suppliers? ___ Yes ___ No

not sure of govern evacuation plan

d. To familiarize local hospitals with the properities of hazardous wastes handled and types of injuries or illnesses that would result? ✓ Yes ___ No

7. Where state or local authorities decline to enter into such arrangements, is this documented in the operating record? N/A ___ Yes ___ No

---

Section C. Contingency Plan and Emergency Procedures

§265.52

1. Does the facility have a contingency plan? ___ Yes ✓ No

a. Is it an amendment to a Spill Prevention Control and Countermeasures (SPCC) Plan? ___ Yes ___ No

b. Does the plan include:

(1) Arrangements with local authorities to coordinate emergency services? ___ Yes ___ No

(2) List of names, addresses and phone numbers of emergency coordinators? ___ Yes ___ No

(3) List of all emergency equipment at facility? ___ Yes ___ No

(4) Evacuation plan ___ Yes ___ No

c. Is a copy of the contingency plan and all revisions:

(1) Maintained at the facility? ___ Yes ___ No

(2) Submitted to all local authorities that may be called upon to provide services? ___ Yes ___ No

§265.55 2. Is there an emergency coordinator on site or on call at all times? ___Yes___No

3. Have there been any incidents requiring the implementation of the contingency plan? ___Yes___No

---

Section D. Manifest System, Recordkeeping and Reporting

§265.71 1. Does facility receive hazardous wastes from off-site sources? (If no, proceed to question 2) ___Yes___No

a. Are hazardous waste shipments accompanied by a manifest? ___Yes___No

1) If yes, does owner/operator:

a. Sign and date each copy of manifest? ___Yes___No

b. Note any significant discrepancies on each copy of manifest? ___Yes___No

c. Give transportor signed copy of manifest? ___Yes___No

d. Send copy of signed copy of manifest to generator within 30 days? ___Yes___No

e. Retain copy of each manifest? ___Yes___No

2) Does facility receive any wastes from a rail or water (bulk shipment) transporter? ___Yes___No

a. If yes, is it accompanied by a shipping paper? ___Yes___No

b. If accompanied by a shipping paper, does the owner/operator utilize it as a manifest? ___Yes___No

§265.76 3) If no, does owner/operator submit an unmanifested waste report? ___Yes___No

§265.72 b. If facility has received any shipments of wastes that were inconsistent with the manifest, did owner/operator:

1) Attempt to reconcile the discrepancy with the generator or transporter? ___Yes___No

2) Submit letter to Regional Administrator on unresolved discrepancies? ___Yes___No

§265.71 2. Does owner/operator initiate shipments of hazardous wastes from facility? ✓ Yes ___ No

If yes, does owner/operator meet Part 262 requirements? (Complete Generator's Checklist) ___ Yes ___ No

§265.73 3. Does owner/operator maintain a written operating record at the facility? ___ Yes ✓ No

If yes, does it include:

a. Description and quantity of each hazardous wastes received? ___ Yes ___ No

b. Method and date of treatment, storage or disposal? ___ Yes ___ No

c. Location and quantity of each hazardous wastes within facility? ___ Yes ___ No

d. Records and results of waste analysis? ___ Yes ___ No

e. Reports of incidents requiring implementation of contingency plan? ___ Yes ___ No

f. Records and results of inspections? ___ Yes ___ No

g. Monitoring, testing or analytical data where required? ___ Yes ___ No

h. Closure cost estimates and (for disposal facilities) post-closure cost estimates? ___ Yes ___ No

§265.75 4. Does owner/operator submit biennial reports to the Regional Administrator? ___ Yes ✓ No

---

Section E. Closure and Post-Closure

§265.13 1. Does the facility have a written closure plan? ___ Yes ✓ No

a. Is a copy of the plan and all revisions to the plan kept at the facility? ___ Yes ___ No

b. Does the plan include?

(1) A description of how and when the facility will be partially closed, if applicable, and finally closed? ___ Yes ___ No

(2) An estimate of the maximum inventory of wastes in storage and in treatment at any time? ___ Yes ___ No

(3) A description of how equipment will be decontaminated? ___Yes___No

(4) An estimate of the expected year of closure and a schedule for final closure? ___Yes___No

(5) How the applicable requirements of §265.197 (tanks), §265.228 (surface impoundments), §265.258 (waste piles), §265.280 (land treatment), §265.310 (landfills), §265.351 (incinerators), §265.381 (thermal treatment), and §265.404 (chemical, physical and biological treatment) are to be met? ___Yes___No

c. If closure is occurring or has occurred, was the closure plan submitted to the Regional Administrator 180 days prior to the date closure was/is to begin? ___Yes___No

§265.113 (1) Was closure/is closure being completed within the time allowed? ___Yes___No

(2) Was closure/is closure being completed in accordance with the approved closure plan? ___Yes___No

§265.115 (3) Was a certification submitted to the Regional Administrator upon completion of closure? ___Yes___No

§265.117 2. (Disposal facilities only) Is the facility required to have post-closure care? ___Yes___No

a. If required, does the facility have a copy of the written post-closure plan with all revisions at the facility? ___Yes___No

§265.118 b. If required, does the plan identify the activities and frequency of these activities which will be carried on after closure? ___Yes___No

---

Section F. Financial Requirements

§265.142 1. Does the facility have the latest closure cost estimate or adjusted closure cost estimate on hand? ___Yes___No

a. Does the owner/operator adjust the closure cost estimate annually or revise the closure cost estimate when the closure plan is charged? ___Yes___No

§265.143 b. Has the owner/operator established financial assurance for closure? ___Yes___No

§265.144 2. (For disposal facilities only). Does the facility have the latest post-closure cost estimate or adjusted closure cost estimate on hand? ___Yes___No

a. Does the owner/operator adjust the post-closure cost estimate annually or revise it when the post-closure plan is changed? ___Yes___No

§265.145 b. Has the owner/operator established financial assurance for post-closure? ___Yes___No

§265.146 3. Has the owner/operator demonstrated financial responsibility for sudden accidential occurrences either by having liability insurance or by passing the financial test for liability coverage, or combination of the two? ___Yes___No

§265.147 4. (For surface impoundments, landfills, or land treatment only). Has the owner/operator demonstrated financial responsibility for nonsudden occurrences either by having liability insurance or by passing the financial test for liability, or combination of the two? ___Yes___No

SUP No. FR001B

40 CFR, Part 262

RCRA COMPLIANCE INSPECTION REPORT
GENERATOR'S CHECKLIST

Section A - Hazardous Waste Determination

1. Does facility generate any wastes excluded from regulation (40 CFR 261.4)? ___Yes___No

If yes, list wastes and quantities and explain ultimate disposition: Caustic wash wastewater on site is excluded

2. Does facility generate any wastes listed in Subpart D of 40 CFR Part 261? ___Yes___No

If yes, list wastes and quantities: wipers F003 & F009

3. Does facility generate any wastes that exhibit a hazardous characteristic (Subpart C, 40 CFR Part 261)? ✓Yes___No

a. If yes, list wastes and quantities: D001

b. Was determination of characteristic made by:
1) Testing of wastes in accordance with methods in Subpart C, 40 CFR, Part 261? ✓Yes___No

2) Applying knowledge of waste regarding material or processes used? ✓Yes___No

4. Does facility generate any other solid wastes? ✓Yes___No

a. If yes, were wastes determined non-hazardous by testing? ___Yes___No

b. If wastes were determined as non-hazardous by applying knowledge of wastes or processes, list wastes and quantities generated (include processes used):

Section B - EPA Identification Number

§262.12 Does generator have an EPA ID Number? ✓Yes___No

1. If yes, EPA ID No: _____

2. If no, does facility meet small quantity generator requirements of 40 CFR, 261.5? ___Yes✓No

Section C - Manifest

1. Does generator ship wastes off-site? ✓ Yes ___ No

a. If no, do not fill out Sections C and D.

b. If yes, identify primary off-site facility(s). (Use narrative explanations sheet.)

§262.20 2. Does generator use manifests? ✓ Yes ___ No

a. If no, is generator a small quantity generator? ✓ Yes ✓ No
~~not with~~ CESQG for D001 + SQG for F019

§262.21 b. ~~If yes~~, does manifest include the following information?

Northland D001 manifest are not required because it a CESQG

These questions are answered for the F019 + F003 waste stream

1) Manifest Document No.

2) Generators Name, Mailing Address, Telephone # ✓ Yes ___ No

3) Generator EPA I.D. No. ✓ Yes ~~no~~ No

4) Transporter(s) Name and EPA I.D. No. ✓ Yes ___ No

5)(a) Facility Name, Address and EPA I.D. No. ___ Yes ___ No
Alternate Facility Name, Address and EPA I.D. No., if any, or (optional) ___ Yes ___ No
Instructions to transporter to return wastes if undeliverable? (optional) ___ Yes ___ No

6) Description of waste(s) required by DOT - proper shipping name, etc. ✓ Yes ___ No

7) Total quantity of each waste by units (weight or volume), number and type of containers. ✓ Yes ___ No

8) Emergency Information (optional) (special handling instructions, phone no.) ___ Yes ___ No

9) The following certification:

"This is to certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the EPA."

§262.23 3. Does generator accomplish the following?

a. Sign and date each manifest? ✓ Yes ~~no~~ ___ No

b. Obtain signed and dated copy of each manifest from transporter? ✓ Yes ___ No

c. Retain one copy of manifest signed by generator and transporter? ✓Yes ___No

d. Retain one signed copy of manifest from designated facility? ✓Yes ___No

Section D - Recordkeeping and Records

§262.40 1. Does generator keep the following reports for 3 years?

a. Signed copies of manifests from designated facilities ✓Yes ___No

b. Annual/Biennial Reports ___Yes ✓No

c. Exception Reports N/A ___Yes ___No

d. Test Results, waste analysis, etc. ✓Yes ___No

2. Where are records kept (at facility or elsewhere)?

_____

3. Who is in charge of keeping the records?
Name_____ Title_____

---

§262.50 Section E - Special Conditions

Has generator exported hazardous wastes to/from a foreign country? ___Yes ✓No

a. If yes, has he filed a notice with the Regional Administrator?

b. Is this waste manifested and signed by Foreign consignee? ___Yes ___No

c. If generator transported wastes out of the country has he received confirmation of delivered shipment? ___Yes ___No

---

Section F - Pre-Transport Requirements did not see any drums of haz mat ready for off-site shipment

§262.30 1. Does Generator package waste in accordance with 49 CFR Parts 173, 178, and 179? (DOT requirements) ___Yes ___No

§262.31 2. Does the Generator use DOT labeling requirements in accordance with 49 CFR Part 172? ___Yes ___No

§262.32 3. Does the generator mark each package in accordance with 49 CFR Part 172? ___Yes ___No

4. Is each container of 110 gallons or less marked with the following label? ___Yes___No

HAZARDOUS WASTE - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.

Generator's Name and Address_____
Manifest Document Number_____

§262.33 5. Does generator have placards to offer to transporters? ___Yes___No

---

Section G - Accumulation Time

Does generator accumulate wastes on-site for more than 90 days? ✓ Yes___No (in past, but not currently)

a. If yes, has generator been granted an extension by proper authority? ___Yes ~~No~~

1) If yes, is extension for more than 30 days? ___Yes___No

2) If no, generator is an operator of a storage facility and is subject to the requirements of 40 CFR Part 265. (Complete Facility's Checklist)

b. If no, does generator accomplish the following:

1) Places wastes in containers (in past) or tanks? ___Yes___No

Note: If containers are used, fill out checklist for containers. If tanks are used, fill out checklist for tanks (Items 5b & c are not applicable).

2) Clearly marks each container with the date upon which each period of accumulation begins? ___Yes___No

3) Clearly marks or labels each container and tank with the words "Hazardous Waste"? ___Yes___No

Note: If generator accumulates wastes on-site for 90 days or less, complete Sections H, I, and J

Section H - Personnel Training (see Interim Status checklist for remaining)

§265.16 8. Does facility have a training program? ___Yes ✓ No

a. Are the following records maintained?

1) Job title and name of individual filling each job? ___Yes___No

2) Written description of each job? ___Yes___No

3) Written description of type and amount of training to be given? ___Yes___No

4) Documentation of training given? ___Yes___No

b. Is an annual review of training accomplished? ___Yes___No

c. Are the training records maintained at the facility? ___Yes___No

d. How long are records kept for:

1) Current employees? _____

2) Former employees? _____

Section I - Preparedness and Prevention

§265.31 1. Is there evidence of fire, explosion or contamination of the environment? ___Yes___No

If yes, use narrative explanation sheet to explain.

---

2. Is the facility equipped with (as appropriate):

a. Internal communication or alarm system? ___Yes___No

b. Telephone or two-way radio to call emergency response personnel? ___Yes___No

c. Portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? ___Yes___No

d. Water of adequate volume and pressure for hoses, sprinklers or water spray systems? ___Yes___No

Describe source of water _____

---

§265.33 3. Are all communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment, where required, tested and maintained to assure proper operation? ___Yes___No

§265.34 4. Are communications or alarm systems, where required, readily accessible? ___Yes___No

§265.35 5. Is there sufficient aisle space to allow unobstructed movement of personnel and equipment in an emergency? ___Yes___No

§265.37 6. Has the owner/operator attempted to make the following arrangements with the local authorities as appropriate:

a. To familiarize police, fire departments and emergency response teams with layout of facility, properties of hazardous waste handled and associated hazards, places where personnel would normally be working, entrances to roads inside facility and possible evacuation routes? ___Yes___No

b. In ther case where more than one police and fire department might respond, agreements designating primary emergency authority? ___Yes___No

c. Agreements with State emergency response teams, emergency response contractors and equipment suppliers? ___Yes___No

d. To familiarize local hospitals with the properities of hazardous wastes handled and types of injuries or illnesses that would result? ___Yes___No

7. Where state or local authorities decline to enter into such arrangements, is this documented in the operating record? ___Yes___No

---

Section J. Contingency Plan and Emergency Procedures

§265.52 1. Does the facility have a contingency plan? ___Yes___No

a. Is it an amendment to a Spill Prevention Control and Countermeasures (SPCC) Plan? ___Yes___No

b. Does the plan include:

1) Arrangements with local authorities to coordinate emergency services? ___Yes___No

2) List of names, addresses and phone numbers of emergency coordinators? ___Yes___No

3) List of all emergency equipment at facility? ___Yes___No

4) Evacuation plan? ___Yes___No

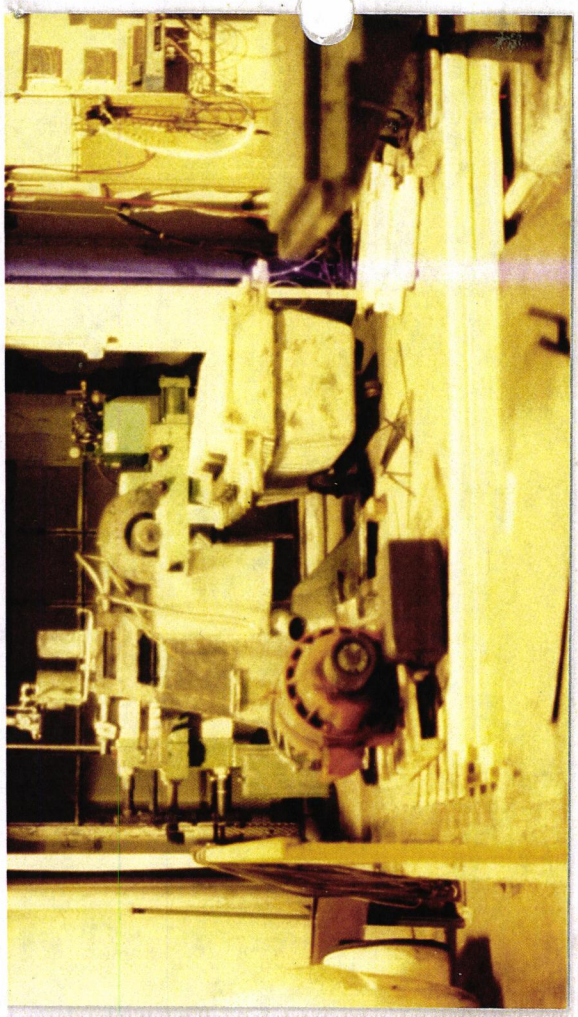
c. Is a copy of the contingency plan and all revisions:

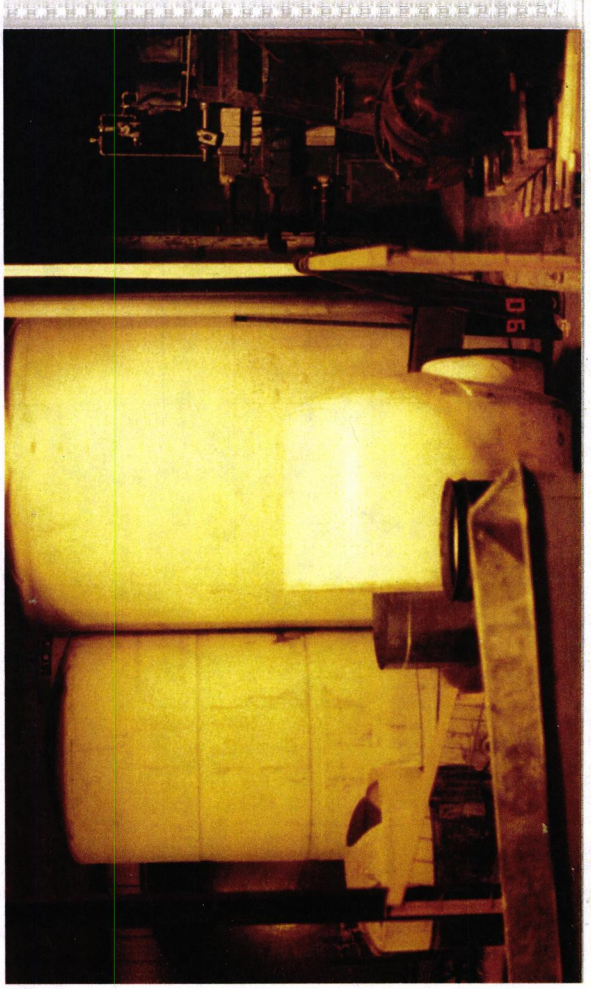
1) Maintained at the facility? ___Yes___No

2) Submitted to all local authorities that may be called upon to provide services? ___Yes___No

§265.55 2. Is there an emergency coordinator on site or on call at all times? ___Yes___No

3. Have there been any incidents requiring the implementation of the contingency plan? ___Yes___No





Area where spent NaOH storage tank was located

(3)

pendence, DA

5/1/90

Area where wastewater pretreatment nks were located

(4)

Newsome

pendence, DA

5/1/90

Area where FO19 drums were stored

Sludge filter press

(2)

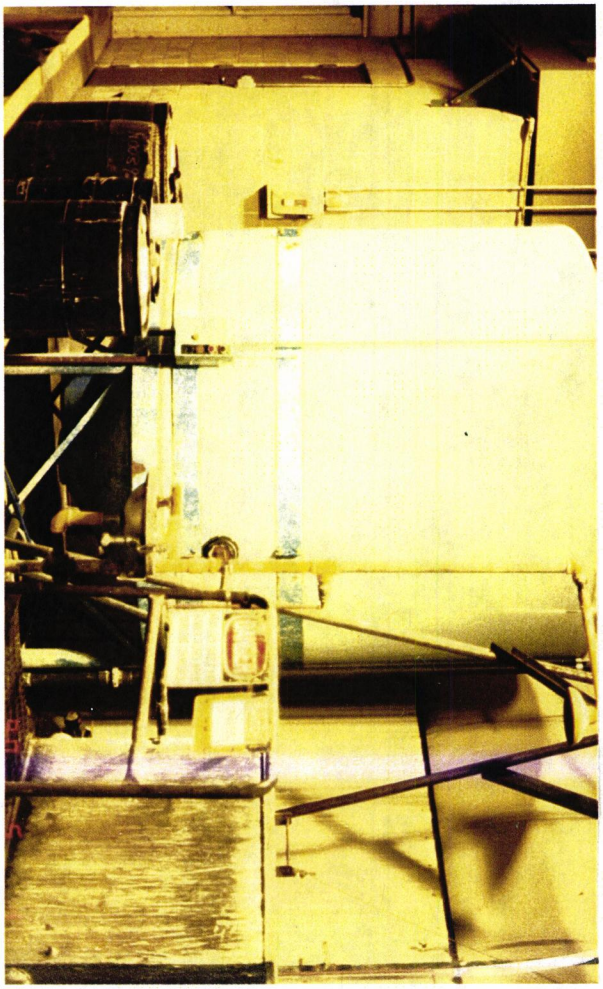
Pries
Independence, DA

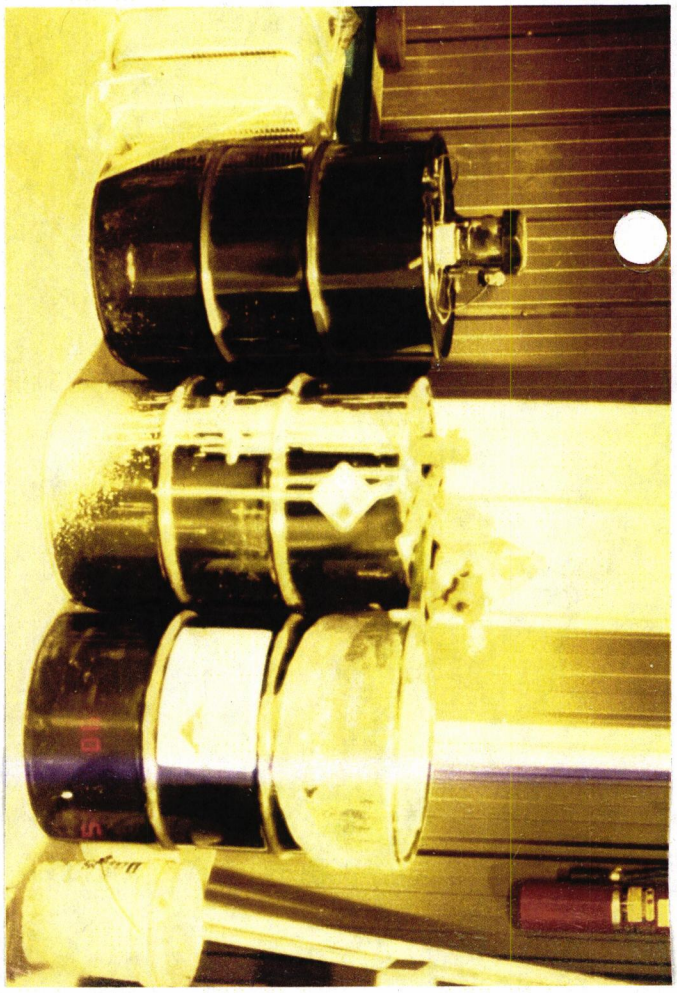
5/1/90

Storage tanks that were used in wastewater pretreatment system (Tank in front on its side is the spent caustic storage tank, largest tank in back was the equilization tank and the tank to the left of it was the holding tank of the wastewater before it was sent to the filter press)

D. Newsome

(1)





Pries
Independence, IA

3/1/90

Spent caustic treatment tank

D. Newsome

(7)

Press Enterprises, Inc
701 17th Street S.E
Independence, IA 50644

5/1/90

Purpose & Procedures
CBI
Participants
Merle McMahon, President
Lynn Slugantz, Engineer, EPA

employees: ~~25-50~~ 30 plant area: same 55000 ft² op hrs: currently added 2nd shift + 80 hrs/wk 40 hrs/wk

Facility Process - Since previous RCRA CEI on 2/11/88

⇒ Mfg extruded Al products by:

/ - Heat 7" diameter Al billets to 900°F

/ - Press ~~them~~ thru dies by hydraulic actuated force

/ - Extruded products are trimmed (fabrication/assembly) & cut to length

- Al parts cleaning No Dec 21 1987 shut
  - A caustic (NaOH) & soap cleaner tank
  - 2 clear H_2O rinses tanks
  - Electroless chrome deposition tank (chromating w/ chromic acid)
  - 2 clear H_2O final rinses

on-site for sale

- Painting
  2 dry booths (3 both operating) any new > on site sold by year end
  colors: white, browns & black 4/11/88 partners 44% no

Used Trial basis May - July 1987
Operated 16 hrs / wk Aug - Dec 1987

- Dry in a large oven

ask again - When stopped painting operations

⇒ • Stopped using the painting operations + parts cleaning operations as they were not functioning as designed after ~~12/22/87~~ -

⇒ • Current Status = • no longer using at all - do ever plan to start new system, what is it in detail, when started, new ww streams
• ~~How~~ How leftover matl (wash tank caustic soda etc) were handled
•

Wastewater pre Treat unit (Batch Treat)

Treated : ~~past~~ parts cleaning operation wst water
(? any other ww)

part of sale

- Equlization basin

- Treat tanks for chrome reduction

- Solids sedimentation

WASTES

- Effluent → POTW
- Sludge dewatered in a plate + frame filterpress

↓ sludge → F019
(had a high pH so disposal facility wouldn't except so stored)

↓ effluent → POTW
(pretreat agreement)
see if still operating

as of 6/20/88 ~~63~~ 49 drums gen during operation => reprocessing wst

stored inside main paint bldg

operating record of sludge generated

how disposed 6/17/88 40 dr manf off-site ? see manf ~~(get name of disposal facility)~~ got copy w/ letter
remaining drums
? Chem Wst Mng, CID Landfill Calumet City, IL

any new tests if still operating

Did treat the remaining 1400 gal of mixed WW in equilization tank (and in the cleaning parts tanks each 2800 gals)

how much sludge gen from this : inc # drums from 49 to 63 (6/20/88); how many more when
in CO response 40 + 44 => 84 shipped 11/4/88
last ship

how handled

classif F019 but not a sludge => gen from a WWTP (solid or liq excluding eff)

op record

no sludge

all remaining chem sent to manuf Hydrite

4th wk in March

Spent Caustic Soln

Die cleanings (removes Al from dies) are done in a tank of caustic (Na OH) soln

↓ spent NaOH gen rate: 300 gal / 6 wks ⇒ ~~change~~ drain tank 1/6 wk

300 gal / 3½ - 4 wk due to 2nd gen rate

Stg tank 300 gal

to be used as a pH adjuster in the WWTP

or for treatment use ? what way

(4 CC speculative or closed loop tank exempt)

how much currently in tank

do have an operating record

- If no painting then caustic is neutralized, precipitated & supernate POTW

what about the solids precipitated out

how handled, amt gen, any test ~~or~~ knowledge (only Al metal?), who dispose recycle etc.

- NaOH are bringing from another Priese Co. on-site or any other wst.

(when Dec 89 ?)

moved st tank inside → pump directly put in old caustic 2500 gal treatment tank that was in pre tmt ?

~~use~~ H_2SO_4 HCl ? to neutralize to 6-8 pH

drain call city & alert before drain

no Al parts remove. moved in Dec 89 d

? 2 drums of methyl parathion - currently do accept any drums from mnf for storage - if so from whom; how ensure triple rinse drum are drum clean

residues from a local agricultural chemical distributor

wst caustic added to drums of residue

Mnf says the ~~caustic~~ & mp mixture is non-haz

- neutralized & precipitated prior to discharge ? where when ______
- what happened to the solids precipitated out ? how much gen
- EPA says no as all wst is POTW & managed as such unless drums 3x rinsed
- how did
- drums were 3x rinsed ? can

- Spent Thinner (During paint operations) ND

Xylene F003 Date of acc 5/10/87

? ~~clear gun~~ cleaner for paint line & equip

gen rate: < 1 55-gal drum

collected in a paint room near painting area

stg drum: label, date

Total amt acc if stopped 6 drums on 6/20/88 letter, 9 of solvent + paint + solv

How disposed & when, where stored until disposed, still on-site

all Mnf, LDR → mnf as a D001 wst not F003 ? see test 8/25/88 to Hydrite

Samples collected by Hydrite Chemic Co, Waterloo

test?

(1) Paint Filters from booths

dried in oven & then disposed w/ trash

30 or 48 18 in^2 filters during operations

if op now
gen rate or times change
how disposed
SWA
tests (any lead chrome paints)

(2) peel paint grease spent ~~Hg~~ done in Dec 88 electrostatic NOAI

how much? 1/2 full 55 gal C1D

paint filters C1D chng 1 time

Waste oil - gen from extruding operations ⇒ spent hydraulic oil from press operations

gen rate: 7 drums since 1/86

collected in 55 gal drums

collected by Eagle Oil Service Cedar Falls, IA

? reclaim or
? burn

(?) gen rate 3-5 gal/MO.

1 parts washer - Northland Oil

(?) type sol 20 gal

Scrap Al - send to remelter to make new billets — Wells Al Monett MO

Gen Trash - cardboard, paper, wood sweeping compound & a small component of refuse

collect in drums in plant — collected by — [illegible]

disposed @ Buchanan County SLF 3 times/wk

gen 3 yd^3/wk

So this all wst

Currently do have any haz wst stored on-site ~~[illegible]~~ on K listed production of chrome pigments

on Notif form (hydrofluric acid) hydrogen flouride hydrogen sulfide

Landfilled any wst on-site NO

Maintenance sh

Richard Hazel, Comp Troller (7)

Records

ō order said 44 dr mnf 43
a 11/4/88 ship of 44 dr according to resp to CO - got copy
See LDR & Mnf w/ 3 sig

Manifests / LDR (review all mnf)
F019 soft hammer, demo + certif; submit certif w/ each ship + notice, demo only once,

*mnf Doc # 5 dig
*no gen # *no date
Proper ship name
*F003 due to Analysis
*no LDR notice

(3) No Prior Waterloo mnf

2 plant operators
3 Maintenance
works people that compl mnf.

Training
Right to Know 3/3 latest train 4/12/90
Written Haz Com program

Contingency Plan
7/31/87 sent fire dept list of chem stored on-site (Right to know)

Biennial Rpt - 1989 because did not gen anything ō
Office Mngr

(6) Closure Plan / Fin Assurance

Waste Analysis Plan —

Inspections containers, tanks, emergency equip Daily insp but no log at least wk

~~150 200 gal~~

(8)

Tour - Glove

3 ds + where was — Painting Area } any material in any tanks etc.

WWT Area

Any new wst acc areas

Stg areas — Aisle space, lables, dates, condition, No smoking, Alarm, Emergency equip

Security — No smoking, Danger sighs

NaOH tank

View product storage area / any paint cleaning products left

Tom Kurimski, Plant Mngr.

All purpose degr. / 5gal pail / clean floors

1 dust collector remelter

Mineral spirits

(2) 4 dr wst oil drain equip

ask plant mng. used oil from trucks & press — Hand Implement Independence, IA

5 1st yr 1 dr gen rate for burning - Dec 89 2-3 dr

no build up w/ solids dont have to remove solid

? soap cleaner — 1 drum Paint order no lid 1/3 full

(3) MSDS — 1 drum Parco Cleaner 334 used in a tank 2/3 full

lab-chem use to test for pH

in $CaSO_4$ i.e. tank

NO comment (don't bring up during CEI)

Consent Order 9/30/88

starton 15 10

Remove all haz wst stored >90

Submit a closure plan for FO19 wst
Implement closure

Establish financial assurance for closure

" liability coverage (sudden)

Submit a new Notif form for current activities

Submit a Contingency Plan

Submit Training Plan

Adequate aisle space

Notify local authorities

Doc wk insp

Label all containers

(10)

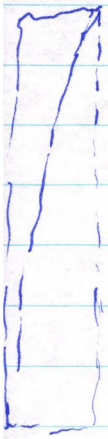
Emte
Priest Waterloo, IA.
3136 Wagner Rd.

caustic cleaning dyes
accept in 30-35 gal
every 6 wks 2-35 gal drums
- store on site → treat tank w/ ijour
NaOH
→ stored in old paint room
3 mnf

Ashley Holmes

Closure too expensive unnecessary

no estimate from company



reasonably improves

stale mate

Test

no current plans

Fin no

Liab no

(12)

- 8828 ck list
- PA System or Internal commun
- Security / On call

- NaOH wst from Waterloo Plant
  - Is mnf?
  - Would have to be a TSD to accept their wst or a State permittee to accept their wst

- Operating Record on-site
- Closure / Fin'l Liability
- ~~[illegible]~~ Treatment of F019 wst w/o a permit
- Storage > 90d for 1/3 drum

16 gen rate (.784)(8.34)
105 lb/mo
19 124 lb/mo

* violation of regardless

* Mnf no Gen ID#, Date, MnfDoc#) 20(a)

~~DOT~~

* Biennial Rpt

Training

Cont Plan

WAP

LDR F003

* proper MnfDoc #

Drum of Paint Solv

* no label or date

* not closed

Started 1st Jan. (13)

262.20(g) Complete Mnf acc AppA
Lob Gen ID#, Dates, Telephone #

262.11 Haz det on paint wst/
D001 being a F003
proper determ

~~Biennia Rpt~~

268.7 no LDR notice w/ F003 wst
proper Mnf Doc #

3005 ~~Sto~~ Storage of pries Waterloo w/o a permit

265.16 Train
265.52 Cont
265.13 WAP
265.15 Insp
265.112 Closure
265 Sub H Fin
265.75 Biennial Rpt

~~Closure~~
Security
PA System
~~Prepared pg 28 ck list~~
~~Operating Rec~~
~~Closure/Fin Ans~~

Treat F019 w/o permit

wst from Waterloo when start
Stg > 90d if paint is a Haz wst; don't accept anymore wst from Waterloo
CESQG but going ~~to~~ do more ck on NaOH because not storing

- Marketer Wst Oil Burner